

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ALEX GOLDFARB,  
Plaintiff,

vs.

Case No.

1:18-CV-08128 (JPC)

CHANNEL ONE RUSSIA,  
Defendant.

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Deposition of ALEXANDER GOLDFARB

Taken via Remote Videoconference

Commencing at 9:31 a.m.

Friday, March 4, 2022

Before Paula S. Raskin, CSR-4757

Ref. No. 4369



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1	A P P E A R A N C E S (All Remote):		1	EXHIBIT I Russian Blog, 3/4/19	236
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3	ROTTENBERG LIPMAN RICH, PC		3	EXHIBIT K Email, Goldfarb to Carter,	259
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1	E X A M I N A T I O N S		1	ALEXANDER GOLDFARB	
2			2	Via Remote Videoconference	
3			3	Friday, March 4, 2022	
4	WITNESS PAGE		4	9:31 a.m.	
5	ALEXANDER GOLDFARB		5	MR. WANGSGARD: All right. Good	
6	EXAMINATION BY MR. WANGSGARD:	5	6	morning, everyone. I think you might know	
7			7	who I am, but just by way of introductions,	
8			8	my name is Ken Wangsgard and I represent	
9	E X H I B I T S		9	Channel One Russia. I'm joined on the	
10			10	phone -- or joined on the video by my	
11	NUMBER DESCRIPTION PAGE		11	colleague Elizabeth Price Foley. She'll be	
12	EXHIBIT A Channel One Russia's First 31		12	listening in, but I do want, you know, just	
13	Set of Requests for		13	to let you know who's on with us today.	
14	Production of Documents to		14	EXAMINATION	
15	Plaintiff		15	BY MR. WANGSGARD:	
16	EXHIBIT B Crimson Article 136		16	Q. Could you please state your name for	
17	EXHIBIT C Affidavit of Goldfarb in 174		17	the record, Dr. Goldfarb, your full name.	
18	Opposition to Motion to		18	A. My name is Alex a/k/a Alexander	
19	Dismiss		19	Goldfarb.	
20	EXHIBIT D Alex Goldfarb's Blog on 214		20	Q. And do you have a middle name?	
21	Echo.msk.ru		21	A. No middle name.	
22	EXHIBIT E Russian Blog, 6/19/18 218		22	Q. And just have you ever been deposed	
23	EXHIBIT F Russian Blog, 7/25/18 221		23	before? Sat for the process that we're going	
24	EXHIBIT G Russian Blog, 7/29/18 226		24	through today?	
25	EXHIBIT H Russian Blog, 2/9/19 234		25	A. No.	



<p style="text-align: right;">Page 6</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Have you given testimony in a</p> <p>3 different environment before, say in a courtroom</p> <p>4 proceeding or similar?</p> <p>5 A. Yes, I did.</p> <p>6 Q. And what was that? Can you describe</p> <p>7 that for us?</p> <p>8 A. It was the lawsuit of Boris</p> <p>9 Berezovsky against a Russian TV station in</p> <p>10 London. I was a witness.</p> <p>11 Q. And did you give live testi- --</p> <p>12 A. Also -- sorry.</p> <p>13 Q. Go ahead.</p> <p>14 A. Also I was a witness in the civil</p> <p>15 suit of Boris Berezovsky against Roman</p> <p>16 Abramovich in London.</p> <p>17 Q. And in those proceedings, did you</p> <p>18 give live testimony?</p> <p>19 A. Yes.</p> <p>20 Q. So, you know, and as we get started,</p> <p>21 I'm going to go over a few of the ground rules</p> <p>22 just so that we all have, you know, an agreed</p> <p>23 understanding, and I would like that</p> <p>24 understanding to be on the record.</p> <p>25 So for some of the rules that we're</p>	<p style="text-align: right;">Page 8</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 dialogue we have will be written down unless we</p> <p>3 all agree to go off the record. So just making</p> <p>4 sure you understand that as well.</p> <p>5 A. Yes.</p> <p>6 Q. It's also important that we try not</p> <p>7 to talk over one another. Obviously she can't</p> <p>8 get down crosstalk, as we call it, so I'm going</p> <p>9 to make sure to do my best to wait until you</p> <p>10 conclude your answer, and, likewise, I would</p> <p>11 just ask that you wait until my question is</p> <p>12 completed before you begin answering. Does that</p> <p>13 make sense?</p> <p>14 A. Yes.</p> <p>15 Q. If I ask a question but you don't</p> <p>16 understand it or you'd like me to rephrase it,</p> <p>17 please let me know that you don't understand it</p> <p>18 or ask that it be rephrased. I'm happy to do</p> <p>19 that.</p> <p>20 It's just that if you -- if I ask a</p> <p>21 question and you answer it without any sort of,</p> <p>22 you know, statement that you don't understand,</p> <p>23 I'm going to assume that you're answering the</p> <p>24 question that's been asked and that you've</p> <p>25 understood it. Does that make sense?</p>
<p style="text-align: right;">Page 7</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 going to go over, you know, obviously at the</p> <p>3 beginning, you were placed under oath by the</p> <p>4 court reporter. The oath is the very same oath</p> <p>5 that you would be given if you were in court</p> <p>6 before the judge. Do you understand that?</p> <p>7 A. Yes.</p> <p>8 Q. And the same rules that govern your</p> <p>9 testimony today, even though we're on video and</p> <p>10 it's a deposition, are the same rules that would</p> <p>11 apply in court before a judge or a jury,</p> <p>12 including rules against perjury. Do you</p> <p>13 understand that?</p> <p>14 A. Yes.</p> <p>15 Q. Just for ease of everyone here, you</p> <p>16 know, obviously the court reporter is taking a</p> <p>17 transcript of everything that's said, therefore</p> <p>18 it's important that you verbalize all your</p> <p>19 responses; yes, nos, et cetera. Obviously the</p> <p>20 court reporter can't get down non-verbal</p> <p>21 responses such as hand motions, nodding of the</p> <p>22 head, shrugs of the shoulder, that type of</p> <p>23 thing. Does that make sense?</p> <p>24 A. Yes.</p> <p>25 Q. You know, any discussion, any</p>	<p style="text-align: right;">Page 9</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. Yes, it does.</p> <p>3 Q. I don't know how long we'll be here</p> <p>4 today, but I suspect it will be probably most of</p> <p>5 the day. So my practice is generally to try to</p> <p>6 take a break at least once an hour; that said,</p> <p>7 if you need a break before then or at any other</p> <p>8 time, just let me know. Any reason, I'm happy</p> <p>9 to take a break.</p> <p>10 My only request is that you not ask</p> <p>11 for a break while a question is pending unless</p> <p>12 you need to talk to Randy about something. So</p> <p>13 other than that, you know, breaks are perfectly</p> <p>14 acceptable. Does that make sense?</p> <p>15 A. Yes.</p> <p>16 Q. You know, your attorney may object to</p> <p>17 questions that I ask. Those objections are for</p> <p>18 the record and for the judge to sort out later.</p> <p>19 So, in other words, you need to answer my</p> <p>20 questions unless you're instructed not to by</p> <p>21 your lawyer. So even if there's an objection,</p> <p>22 you still have to answer, you know, the arguably</p> <p>23 objectionable question. Does that make sense?</p> <p>24 A. Okay, yes.</p> <p>25 Q. And so is there anything about your</p>



<p style="text-align: right;">Page 10</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 health today from, you know, a physical or a</p> <p>3 mental or emotional reason that would interfere</p> <p>4 with going forward with the deposition?</p> <p>5 A. No.</p> <p>6 Q. Is there anything about your health,</p> <p>7 you know, physical, mental, or emotional, that</p> <p>8 would get in the way of giving your most</p> <p>9 accurate and honest testimony?</p> <p>10 A. No.</p> <p>11 Q. Have you taken any medications in the</p> <p>12 last 24 hours that would affect your ability to</p> <p>13 give your best testimony today?</p> <p>14 A. No.</p> <p>15 Q. Since say March of 2018, have you</p> <p>16 taken any medications at any time that would</p> <p>17 interfere with your memory?</p> <p>18 A. Other than an occasional sleeping</p> <p>19 pill.</p> <p>20 Q. And how often do you take sleeping</p> <p>21 pills?</p> <p>22 A. Couple of times a month.</p> <p>23 Q. And are those prescribed or</p> <p>24 over-the-counter or what are those?</p> <p>25 A. Prescribed.</p>	<p style="text-align: right;">Page 12</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 that interfere with your memory?</p> <p>3 A. No.</p> <p>4 Q. Is there other -- any other reason</p> <p>5 that we haven't addressed that you can think of</p> <p>6 why you would not be able to testify today in an</p> <p>7 accurate and honest manner?</p> <p>8 A. No.</p> <p>9 Q. So we talked about it a little bit</p> <p>10 with some of your medications, but generally how</p> <p>11 is your health, just from a general perspective?</p> <p>12 A. I would say it's all right given -- I</p> <p>13 mean within the limits of age, I think I'm fine.</p> <p>14 Q. And has it changed at all since March</p> <p>15 of 2018?</p> <p>16 A. Not really.</p> <p>17 Q. So "not really" is an interesting</p> <p>18 answer. I mean it could be yes, it could be no,</p> <p>19 it could be a little bit, so...</p> <p>20 A. Okay. No.</p> <p>21 Q. No?</p> <p>22 A. No.</p> <p>23 Q. Can you tell me what sort of medical</p> <p>24 treatment you've received since approximately</p> <p>25 March of 2018?</p>
<p style="text-align: right;">Page 11</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. And do you know the name of that</p> <p>3 prescription, what the actual drug is?</p> <p>4 A. It's Ambien.</p> <p>5 Q. And how long have you been taking</p> <p>6 prescribed Ambien?</p> <p>7 A. Maybe five or -- between five and ten</p> <p>8 years.</p> <p>9 Q. So predating the lawsuit -- you know,</p> <p>10 postdating the events that gave rise to the</p> <p>11 lawsuit, but predating the 2018 episodes that</p> <p>12 are subject of your complaint? Is that</p> <p>13 accurate?</p> <p>14 A. Yes.</p> <p>15 Q. Do you have any other prescription</p> <p>16 medications that you take?</p> <p>17 A. Oh, yes.</p> <p>18 Q. What are those?</p> <p>19 A. Blood pressure, statin for</p> <p>20 cholesterol, and this thing called metformin for</p> <p>21 my diabetes.</p> <p>22 Q. And how long have you been prescribed</p> <p>23 those medications?</p> <p>24 A. I guess 15 years or so.</p> <p>25 Q. Do you have any medical conditions</p>	<p style="text-align: right;">Page 13</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. I had a broken ankle and I had a</p> <p>3 cast. That's probably quite recently, but</p> <p>4 otherwise, no real -- no serious medical</p> <p>5 treatment except for the maintenance of my</p> <p>6 chronic conditions.</p> <p>7 Q. And by "chronic," we're referring to</p> <p>8 the blood pressure, the cholesterol, and the</p> <p>9 diabetes?</p> <p>10 A. Yes.</p> <p>11 Q. And what type of doctor prescribes</p> <p>12 the Ambien?</p> <p>13 A. General, my GP, my family doctor.</p> <p>14 Q. Are you seeing a psychologist or a</p> <p>15 psychiatrist for any reason?</p> <p>16 A. No.</p> <p>17 Q. Have you at any time in the last ten</p> <p>18 years?</p> <p>19 A. No.</p> <p>20 Q. Have you sought any sort of mental</p> <p>21 health treatment as a result of, you know, the</p> <p>22 four programs aired by Channel One that are at</p> <p>23 issue?</p> <p>24 A. No.</p> <p>25 Q. We might address some of that a</p>



<p style="text-align: right;">Page 14</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 little bit later, but I want to move on and ask</p> <p>3 you what you've done to prepare for today's</p> <p>4 deposition.</p> <p>5 A. Well, I watched Channel One current</p> <p>6 news programs for a couple of days just to see</p> <p>7 whether anything has changed in the general</p> <p>8 attitudes and the coverage styles of the</p> <p>9 program -- of the channel.</p> <p>10 I reviewed your counterclaim and some</p> <p>11 of my own documents, such as my posts in my blog</p> <p>12 over the past few years which related to the</p> <p>13 current case. They're all in the -- in the</p> <p>14 evidence that I provided.</p> <p>15 Q. Did you meet or have any virtual or</p> <p>16 in-person meetings with anybody in preparation</p> <p>17 for the deposition?</p> <p>18 A. Nobody except my attorneys.</p> <p>19 Q. And when did you last meet with your</p> <p>20 attorneys?</p> <p>21 A. Yesterday. I mean virtually over the</p> <p>22 phone yesterday.</p> <p>23 Q. And was anybody present in that</p> <p>24 meeting other than your attorneys?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 16</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 2019.</p> <p>3 Q. And where did you see her?</p> <p>4 A. In London.</p> <p>5 Q. And what brought you to London -- or</p> <p>6 I guess, actually, does she live in London?</p> <p>7 A. She lives in London, yes.</p> <p>8 Q. And what brought you to London?</p> <p>9 A. Well, I can tell you exactly. It was</p> <p>10 the summer of 2019 when I saw her last, and I</p> <p>11 went to London to attend the recital of the</p> <p>12 opera in London titled "The Life and Death of</p> <p>13 Alexander Litvinenko," which was based on my</p> <p>14 book co-written with Marina.</p> <p>15 Q. And was that premiering or --</p> <p>16 A. It was a premier, yes.</p> <p>17 Q. And who paid for your travel over to</p> <p>18 see the premier of the opera?</p> <p>19 A. I paid myself.</p> <p>20 Q. And so setting aside the last time</p> <p>21 you saw Ms. Litvinenko in person, when's the</p> <p>22 last time you spoke to her, you know, either on</p> <p>23 the phone, Zoom, and any other manner that</p> <p>24 wasn't in person?</p> <p>25 A. I probably -- exactly I spoke to</p>
<p style="text-align: right;">Page 15</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Did you review any other documents</p> <p>3 other than sort of the blog posts that you</p> <p>4 mentioned, the claims, the counterclaims? Any</p> <p>5 other documents that you reviewed?</p> <p>6 A. Not within the -- within the relation</p> <p>7 to this case. But, otherwise, I'm a reading</p> <p>8 person and I review lots of things which appear</p> <p>9 on the internet.</p> <p>10 Q. And who is Marina Litvinenko?</p> <p>11 A. Marina Litvinenko is my friend and my</p> <p>12 colleague in the organization that we both</p> <p>13 belong to called Litvinenko Justice Foundation,</p> <p>14 and she's the wife of the Alexander Litvinenko</p> <p>15 who is in the center of this case, late</p> <p>16 Alexander Litvinenko.</p> <p>17 Q. And have you had any discussions with</p> <p>18 Marina Litvinenko about your deposition today?</p> <p>19 A. I just told her that I might be</p> <p>20 giving a deposition, that's all. And it was</p> <p>21 probably a month ago or before that.</p> <p>22 Q. When is the last time you saw her in</p> <p>23 person?</p> <p>24 A. Oh, it was before the pandemic, so it</p> <p>25 should be sometime in early 2020 or maybe late</p>	<p style="text-align: right;">Page 17</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 her -- well, probably three or four days ago,</p> <p>3 when she called me from London.</p> <p>4 Q. And what was the purpose of her call?</p> <p>5 A. Well, we are close friends and we</p> <p>6 confer on the phone quite often.</p> <p>7 She told -- in this particular case,</p> <p>8 she told me two things: first, that she's safely</p> <p>9 out of Ukraine, because she was in Ukraine when</p> <p>10 the war started and that was the reason why</p> <p>11 he [sic] disappeared for a few days; and the</p> <p>12 second thing she told me is that she attended</p> <p>13 the premier of the first episode of a miniseries</p> <p>14 titled "Litvinenko," which is to be released by</p> <p>15 the British cable channel ITV later this year.</p> <p>16 Q. Do you know why she was in Ukraine?</p> <p>17 A. She went for -- I think just for</p> <p>18 vacation, she told me, and was surprised by the</p> <p>19 Russian attacks. She was in west Ukraine and</p> <p>20 was able to get out on the bus with a bunch of</p> <p>21 refugees.</p> <p>22 Q. But when you spoke to her three or</p> <p>23 four days ago when she called you from London,</p> <p>24 you didn't discuss the deposition though?</p> <p>25 A. No.</p>



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Q. When's the last time you spoke with her regarding the subject matter of the lawsuit that's at issue today?

A. Well, in general terms, I speak to her -- almost every time we speak, like I explain what's going on with the case and what stage we are and what is it to expect.

But as far as the substance is concerned, I don't really tell her more than what I put on my blog online, so all of this can be gathered from there. It's a general chronology and summary of the things that are happening, mostly exclusively what's -- exclusively what is known in the public domain, such as on the website of the court -- of the, you know, court docket.

Q. Has she participated in any of -- any meetings you've had with your lawyers?

A. Yes. It was in 2018, when she was in New York and Washington. Just before we filed the complaint, she was here and her son was here and we met with Randy, and that was -- I believe is the only time she participated in the lawyer's meeting.

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Q. What role, if any, did she have in helping craft the allegations in the complaint?

A. She didn't have any role in creating the -- essentially the text of it and the particulars of the complaint, but she reviewed the complaint before I filed it, and she approved it, essentially, because she -- initially it was thought that she would be a party to this complaint, but it turned out that for legal reasons she cannot be, so I went alone.

Also she gave a lot -- many interviews about this lawsuit in 2018, including the time when she visited New York, so obviously she was very well-informed about what's going on.

Q. And other than what you've described so far, have you talked to anyone else about your deposition, friends, neighbors, the fact that you would be...

A. No, no.

Q. You've touched on it a little bit, but could you describe to me sort of what is your relationship with Ms. Litvinenko and sort

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of how long it's lasted.

A. Well, I first met her in Turkey in the course of their flight from Russia to UK when I went there to help them, and it was quite a dramatic setting because they were -- we believed they were pursued by the Russian security services, she and her husband and their son.

And then we stayed friendly, and I met her many, many times in London, and she came over here, so -- in the United States.

And when our book was released in 2007, we were both on the book tour in several countries and across the United States, so that's essentially what it was.

Oh, yes. And, of course, during the Litvinenko inquiry and before the Litvinenko inquiry, during the preparation of the inquiry -- it was 2015 -- 2012, 2016, I guess, where -- when I went to London all the time, and took a very active part in working with the lawyers and with her and communicating with the judge and giving evidence, and at that same time talking to the police investigating the murder.

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Q. And how would you describe the relationship? Is it friends? Is it...

A. We're close friends, yes.

Q. Has the relationship ever been romantic or sexual?

A. No.

Q. Did you know her before you met her husband, or did you meet her through...

A. I met them together.

Q. So you sort of touched on it a little bit, but can you tell me in your understanding why she didn't join you as a plaintiff in this lawsuit?

A. My understanding is that the requirements of the US law, for foreign persons suing other foreign persons in the New York Federal Court, exclude her from being a plaintiff. That is my understanding. Maybe I'm wrong. That's how I understood my lawyer's advice.

Q. So just on that, you know, if I ask you for your understanding of something, you're -- you know, you're happy -- you're welcome to tell me what you understand, but I

6 (Pages 18 to 21)



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<p>1 ALEXANDER GOLDFARB</p> <p>2 don't necessarily want you to tell me if you got</p> <p>3 that understanding from a discussion with your</p> <p>4 lawyers or anyone else.</p> <p>5 A. Okay.</p> <p>6 Q. It's not really my place to go into</p> <p>7 that. So, again, if you have an understanding,</p> <p>8 share that with me, but don't necessarily tell</p> <p>9 me where that came from.</p> <p>10 A. So I would say that she would have</p> <p>11 been a party to this lawsuit if not for our</p> <p>12 understanding that she's precluded by this -- by</p> <p>13 legal reasons.</p> <p>14 Q. Would you characterize her as a</p> <p>15 supporter of your lawsuit, notwithstanding the</p> <p>16 fact that she's not --</p> <p>17 A. Yes. Yeah. She's a moral supporter.</p> <p>18 She's not a financial supporter.</p> <p>19 Q. Does she have a fundraising page for</p> <p>20 it, a GoFundMe or another mechanism?</p> <p>21 A. Well, she is very prominently</p> <p>22 represented on my fundraising page and, you</p> <p>23 know, she talks to people.</p> <p>24 In 2018 -- before 2018 filing of the</p> <p>25 lawsuit, when I was in London, we had a</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 A. Well, the thing is that we, both of</p> <p>3 us, believe that we were both defamed by the</p> <p>4 programs and broadcasts in question, separately</p> <p>5 and together; specifically that she feels that</p> <p>6 allegations of me murdering her husband is a</p> <p>7 stain on her campaign to get justice for her</p> <p>8 husband, which culminated of course in the</p> <p>9 decision of the British inquiry; and,</p> <p>10 separately, when one of the program participants</p> <p>11 alleged that she gave false testimony in the</p> <p>12 London court.</p> <p>13 So this is perceived by her as acts</p> <p>14 of libel and defamation, and initially we</p> <p>15 thought that that would be part of our joint</p> <p>16 complaint, but as I said, I ended up doing it</p> <p>17 alone.</p> <p>18 Q. Is she a UK citizen? Is she --</p> <p>19 A. She's a UK citizen. As far as I</p> <p>20 know, she's a Russian.</p> <p>21 Q. But you think she was naturalized in</p> <p>22 the UK at some point?</p> <p>23 A. Yes. Yes, I know that.</p> <p>24 Q. Do you know if she's ever pursued any</p> <p>25 defamation claims in the UK against any party?</p>
Page 23	Page 25
<p>1 ALEXANDER GOLDFARB</p> <p>2 fundraising event when she spoke. So she is,</p> <p>3 but only inasmuch as it's part of my own</p> <p>4 fundraising.</p> <p>5 Q. So do you know whether or not she has</p> <p>6 an independent GoFundMe page?</p> <p>7 A. No, I don't know about that.</p> <p>8 I should clarify. There was another</p> <p>9 fundraising page in 2013 to about I think 2016</p> <p>10 where we both were kind of owners of that page</p> <p>11 and we raised money to fund her legal expenses</p> <p>12 in the Litvinenko inquiry until the bill was</p> <p>13 picked up by Her Majesty's Government.</p> <p>14 Q. Do you know if she's ever described</p> <p>15 this legal action, quote, it's as good as if it</p> <p>16 were my own, or mine?</p> <p>17 A. I don't remember exactly those words,</p> <p>18 but it is quite possible that she did because it</p> <p>19 is -- it reflects her attitude.</p> <p>20 Q. I mean did you want her as a</p> <p>21 plaintiff?</p> <p>22 Notwithstanding, you know, your</p> <p>23 understanding that it wasn't possible, but if it</p> <p>24 were possible, did you want her to be a</p> <p>25 plaintiff?</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 A. I don't think she did, as far as I</p> <p>3 know.</p> <p>4 Q. Have you ever been the plaintiff in a</p> <p>5 civil suit before the current one?</p> <p>6 A. Let me think.</p> <p>7 No, I don't think so. No.</p> <p>8 Q. Have you ever been the defendant in a</p> <p>9 civil suit before or at any time?</p> <p>10 A. A defendant in a civil suit? No, no,</p> <p>11 not that I remember.</p> <p>12 Q. And what about the defendant in any</p> <p>13 criminal suit?</p> <p>14 A. No.</p> <p>15 Q. Without getting into, you know, sort</p> <p>16 of anything that you discussed with your legal</p> <p>17 counsel, can you tell me if you ever considered</p> <p>18 bringing this lawsuit in State Court in New York</p> <p>19 or New Jersey?</p> <p>20 A. No.</p> <p>21 Q. Is that just something you didn't</p> <p>22 look into or didn't want to or...</p> <p>23 A. I did my own research even before</p> <p>24 talking to lawyers, and figured out that a</p> <p>25 federal suit would be most appropriate.</p>



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One clarification: At some point there was an idea of bringing the suit in the United Kingdom, and I did discuss it with a British lawyer.

Q. But ultimately you chose not to bring it in the UK?

A. Yes.

Q. Without going into substance, was that due to discussions you had with your UK lawyer?

A. It was due to a combination of things; mostly my own research, but also conversations with a lawyer, because I felt that the standard of proving a defamation in the US is much higher than in the UK, and thereby it would carry a bigger weight, so to say. So I wanted to have this case decided based on a higher legal standard.

Q. So if I'm understanding, you sought out the more onerous jurisdiction to prove your claims because, if successful, you think that would be a larger victory? Is that a fair or a --

A. It would be a larger moral victory

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obviously, and from the point of view -- from the standpoint of the let's say I would say public impact, it would be a much higher victory.

Q. But had you brought it in the UK, presumably Ms. Litvinenko would have been able to join you as a plaintiff.

A. Yes.

Q. Did you discuss that trade-off with her; the fact that in order to get a greater public impact and a greater -- a larger moral victory, that she wouldn't be able to be a participant?

A. Yes, I did, at the time.

Q. And how did that discussion -- you know, what was the substance of that discussion?

A. Well, in this whole endeavor, I was essentially the driving force, so I explained to her what I think and she agreed.

Q. And based on your own research when you were looking into where to file, did you look into whether or not she could join you as a plaintiff if you had sued in State Court?

A. No, I never researched it.

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Q. Sitting here today, do you have any understanding as to whether or not she could be a plaintiff if you had brought the case in State Court?

A. I have no idea.

MR. WANGSGARD: So I think I'm going to try to do an exhibit. So bear with us here while I'm -- I think the best way to do this is pull it up and share it and see if that works because I know we haven't really done exhibits in these proceedings too much.

MR. SELLIER: So are you going to tell me the tab number from your email?

MR. WANGSGARD: Yes. Let's go off the record for just a minute while we figure this one out, and then we'll --

MR. SELLIER: Okay.

(Off the record at 10:05 a.m.)

(Back on the record at 10:05 a.m.)

MR. WANGSGARD: All right. So let's go back on the record at I guess 10:05.

BY MR. WANGSGARD:

Q. So just on the prior topic, before we

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get to this document, is there a reason why you didn't do your own research regarding State Court as a place where you could have brought these claims?

A. I cannot recall right now. I guess it was because it didn't occur to me that I should go to State Court.

Oh. I can tell you. Now I recall. I went --

(Outside interruption and reporter clarification.)

A. I went the time to the legal clinic --

(Reporter clarification.)

A. I went to get a view on this to a legal aid clinic at the Southern District Court, and a lawyer there said that I have a reasonable --

MR. SELLIER: So Alex?

THE WITNESS: Yes.

MR. SELLIER: You really don't have to talk about what any lawyers told you.

THE WITNESS: Okay. Sure, sorry.

A. No. Other than the lawyer's advice,

8 (Pages 26 to 29)



<p style="text-align: right;">Page 30</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 I didn't look into this.</p> <p>3 BY MR. WANGSGARD:</p> <p>4 Q. So, again, without going into the</p> <p>5 substance, you looked into it, talked to some</p> <p>6 lawyers, but reached -- you know, came to the</p> <p>7 conclusion that you wanted to see where you did</p> <p>8 without --</p> <p>9 A. Yes. I came to the conclusion that</p> <p>10 that's the right venue, but I didn't really look</p> <p>11 very seriously into the State Court issue.</p> <p>12 Q. And so on things like that, I'm happy</p> <p>13 to reach, you know, tell me A to C without</p> <p>14 connecting the dots as to what B, B and a half,</p> <p>15 B and three-quarters were in the middle if it</p> <p>16 involved lawyers, and that includes whether it's</p> <p>17 your current lawyer or, you know, someone that</p> <p>18 you consulted with even if you didn't retain</p> <p>19 them. Just --</p> <p>20 A. Okay.</p> <p>21 Q. -- on privilege issues, I'm not -- I</p> <p>22 want you to know I'm not asking, and I'm not</p> <p>23 trying to get you to tell me either.</p> <p>24 A. Sure.</p> <p>25 Q. So I have put on the screen here a</p>	<p style="text-align: right;">Page 32</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 please.</p> <p>3 Q. Have you seen this document before?</p> <p>4 A. Yes.</p> <p>5 Q. When?</p> <p>6 A. Last time I saw it, yesterday, and</p> <p>7 then I saw it when it was produced.</p> <p>8 Q. So what's the context in which you</p> <p>9 saw it yesterday?</p> <p>10 A. Well, in preparing for this</p> <p>11 deposition, I reviewed documents which I --</p> <p>12 briefly reviewed documents that I thought could</p> <p>13 be relevant, so I kind of read through it very</p> <p>14 quickly.</p> <p>15 Q. And without going into substance,</p> <p>16 have you previously discussed this document with</p> <p>17 your lawyers?</p> <p>18 A. I don't remember. I might have.</p> <p>19 Q. Did you receive it from your lawyers</p> <p>20 when it was first...</p> <p>21 A. I am subscribed to the, you know,</p> <p>22 court records service, so I might have gotten it</p> <p>23 from there or -- and/or from my lawyers.</p> <p>24 Q. And do you think that was</p> <p>25 approximately, you know, maybe late July 2021?</p>
<p style="text-align: right;">Page 31</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 document. Can you see the document,</p> <p>3 Dr. Goldfarb?</p> <p>4 A. Yes, I do.</p> <p>5 MR. WANGSGARD: Just for the record,</p> <p>6 I'm going to mark this one as Exhibit A, at</p> <p>7 least virtually. This is a 12-page</p> <p>8 document titled "Defendant Channel One</p> <p>9 Russia's First Set of Requests for</p> <p>10 Production of Documents to Plaintiff."</p> <p>11 (DEPOSITION EXHIBIT A MARKED</p> <p>12 FOR IDENTIFICATION at 10:08 a.m.)</p> <p>13 A. Yes.</p> <p>14 BY MR. WANGSGARD:</p> <p>15 Q. You're welcome -- I don't know if</p> <p>16 you -- do you have a copy of this in front of</p> <p>17 you, or you have just the one that's on my</p> <p>18 screen?</p> <p>19 A. I just have it on my screen.</p> <p>20 Q. You're welcome to review the whole</p> <p>21 document, which I guess I can do by scrolling</p> <p>22 through it, if you'd like, but otherwise I've</p> <p>23 got just some specific questions, so let me know</p> <p>24 if you'd like to review this first.</p> <p>25 A. No. Go ahead with your questions,</p>	<p style="text-align: right;">Page 33</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. I would say I think so, when it was</p> <p>3 posted on the web.</p> <p>4 Q. So in summer 2021 when you received</p> <p>5 this document, what did you do after receiving</p> <p>6 the document?</p> <p>7 A. What did I do? It is the request for</p> <p>8 production, right? So I took my laptop, which</p> <p>9 is the depository of all my archive, and I did a</p> <p>10 thorough search, both on the email and the</p> <p>11 documents and the files, using keywords, and</p> <p>12 whatever came up I reviewed, to the extent</p> <p>13 reasonably possible, because there were tons and</p> <p>14 tons and tons of documents, both relevant, in my</p> <p>15 view, and unrelated, and I compiled those</p> <p>16 documents into a file and sent it to Randy for</p> <p>17 production.</p> <p>18 Q. And were you the one who selected</p> <p>19 sort of the keywords that you used for your</p> <p>20 search?</p> <p>21 A. Yes.</p> <p>22 Q. Did you keep a copy of those keywords</p> <p>23 anywhere on a list that you were searching, or</p> <p>24 just...</p> <p>25 A. No, I don't think so. I just, you</p>



<p style="text-align: right;">Page 34</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 know, keyed in the keywords and whatever came</p> <p>3 up.</p> <p>4 Q. Sitting here today, do you recall</p> <p>5 what any of those keywords were?</p> <p>6 A. Well, there were many specific</p> <p>7 requests, so I would presume that for each of</p> <p>8 them, I came up with a specific set of keywords.</p> <p>9 Q. And were those keywords just in your</p> <p>10 email or were they across other documents?</p> <p>11 A. It was both for the email records in</p> <p>12 my email service and for the files which are</p> <p>13 stored on my hard disk.</p> <p>14 Q. And the email that you searched, how</p> <p>15 long have you had that particular email address</p> <p>16 and...</p> <p>17 A. Oh, I have it for ages, so it was</p> <p>18 probably for 20 years I have this email.</p> <p>19 Q. And do the emails that are stored on</p> <p>20 there go back, you know, to the beginning?</p> <p>21 A. I didn't get it. Say it again,</p> <p>22 please.</p> <p>23 Q. Do the emails that you have in that</p> <p>24 address, do they go back to the beginning, the</p> <p>25 inception, of that account?</p>	<p style="text-align: right;">Page 36</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 happened before really.</p> <p>3 I want to clarify something, if I may</p> <p>4 digress. In the middle of -- when was that? It</p> <p>5 was sometimes in the early 2000s, so probably</p> <p>6 2002 and 2003, I was involved in the</p> <p>7 investigation by the Manhattan District Attorney</p> <p>8 Office, and they requested to produce documents.</p> <p>9 At that time, my lawyers came up with, I don't</p> <p>10 know, several thousand pages of documents which</p> <p>11 were produced to the DA office.</p> <p>12 And I also -- and I have these boxes</p> <p>13 with those documents. So I dug into that and</p> <p>14 produced some earlier documents of the beginning</p> <p>15 of the 2000s, whichever you have in the</p> <p>16 production, and added to them what I produced</p> <p>17 now.</p> <p>18 Q. And what Manhattan DA investigation</p> <p>19 was that, if you recall?</p> <p>20 A. The Manhattan DA investigation, as I</p> <p>21 understand it -- they never specified it</p> <p>22 specifically, but I -- from the way it's</p> <p>23 conducted, they were interested in some aspects</p> <p>24 of Boris Berezovsky's activities, so they wanted</p> <p>25 me to produce all the emails, you know, and</p>
<p style="text-align: right;">Page 35</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. Yes, except for all kinds of --</p> <p>3 sometimes I do the cleaning and, you know, I get</p> <p>4 rid of obvious junk, but mostly I keep all the</p> <p>5 emails.</p> <p>6 Q. And then the computer you used, is</p> <p>7 that a laptop or a desktop?</p> <p>8 A. It's a laptop.</p> <p>9 Q. And how long have you had the</p> <p>10 particular laptop that you currently use?</p> <p>11 A. Well, on average, I replace them</p> <p>12 every few years, let's say every three to four</p> <p>13 years, so it's probably fifth or sixth</p> <p>14 generation if you count from the beginning of</p> <p>15 the storing, 2000.</p> <p>16 And the archive, not necessarily, you</p> <p>17 know, is transferred from one computer to</p> <p>18 another, but I believe I did a good job of</p> <p>19 searching for whatever is responsive.</p> <p>20 Q. So when you get a new computer, do</p> <p>21 you have a backup of what you call an archive</p> <p>22 that you keep?</p> <p>23 A. Well, I don't -- I -- yes, I do</p> <p>24 transfer the file archives, definitely for the</p> <p>25 past few years, and I don't remember what</p>	<p style="text-align: right;">Page 37</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 phone records and bank transfers and so on.</p> <p>3 At the time, I was running</p> <p>4 essentially a not-for-profit corporation called</p> <p>5 International Union for Civil Liberties, funded</p> <p>6 by Berezovsky to support a Russian civil</p> <p>7 society. It folded up in 2006 or '07 after</p> <p>8 Litvinenko's murder, but at the time, we were</p> <p>9 channeling tons of money, probably millions, to</p> <p>10 various NGOs and human rights groups and</p> <p>11 independent media in Russia or around Russia.</p> <p>12 And also we were involved in</p> <p>13 advocacy, essentially exposing what we believed</p> <p>14 was the criminal activities of the Russian</p> <p>15 government around the world and -- including the</p> <p>16 parliaments, you know, governments and so on.</p> <p>17 So it was a relatively big operation,</p> <p>18 and all of this was funded by Berezovsky, who</p> <p>19 sent money to this international foundation.</p> <p>20 International Foundation for Civil Liberties,</p> <p>21 that's how it was called, IFCL. So he was</p> <p>22 transferring money from all kinds of places to</p> <p>23 our accounts in the US, and we spend them the</p> <p>24 way essentially -- I ran it. It was mostly my</p> <p>25 operation.</p>



<p style="text-align: right;">Page 38</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 And the DA was interested in all of</p> <p>3 these activities, apparently seeking to find</p> <p>4 something illegal. It was a Grand Jury</p> <p>5 investigation, but it came to nothing. After we</p> <p>6 produced everything, they just forgot about it.</p> <p>7 Q. And just so the record's clear, you</p> <p>8 said International Union, but you now think</p> <p>9 it -- you're correcting it to International</p> <p>10 Foundation for Civil Liberties?</p> <p>11 A. It was International Foundation for</p> <p>12 Civil Liberties.</p> <p>13 Q. So if I say IFCL, we'll all agree</p> <p>14 that we know what we're talking about?</p> <p>15 A. Yeah.</p> <p>16 Q. Just to clarify, what was your role</p> <p>17 with IFCL at the time?</p> <p>18 A. I was the executive director</p> <p>19 essentially, CEO.</p> <p>20 Q. And it was the investigation of</p> <p>21 Mr. Berezovsky, as you understand, or the IFCL?</p> <p>22 Or who was the target, in your understanding?</p> <p>23 A. I think I was the target. I was the</p> <p>24 target, but he was the reason.</p> <p>25 Q. So unpack that for me a little bit,</p>	<p style="text-align: right;">Page 40</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 a personal capacity or addressed to you in your</p> <p>3 capacity as the head of the organization?</p> <p>4 A. I think -- I don't remember exactly,</p> <p>5 but I think they were addressed to me in my</p> <p>6 personal capacity.</p> <p>7 Q. And were the documents requested</p> <p>8 personal documents or IFCL documents?</p> <p>9 A. It was all IFCL documents.</p> <p>10 Q. And you produced IFCL documents.</p> <p>11 A. Yes.</p> <p>12 Q. Did you have any meetings at any</p> <p>13 point with prosecutors, with New York</p> <p>14 prosecutors?</p> <p>15 A. No. My lawyers did.</p> <p>16 Q. But you didn't attend them?</p> <p>17 A. No.</p> <p>18 Q. And was any proceeding, criminal or</p> <p>19 civil, brought as a result of the investigation</p> <p>20 that they were conducting?</p> <p>21 A. No.</p> <p>22 Q. And when you say that you were</p> <p>23 I guess the target or the subject, what's your</p> <p>24 understanding of the term? Just as the person</p> <p>25 who received it, or do you have a different</p>
<p style="text-align: right;">Page 39</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 if you will --</p> <p>3 (Outside interruption and reporter</p> <p>4 clarification.)</p> <p>5 Q. So unpack that for me a little bit.</p> <p>6 Why do you say you were the target of the</p> <p>7 Manhattan DA investigation?</p> <p>8 A. Because I ran the organization and</p> <p>9 what the -- and Berezovsky was the reason, but</p> <p>10 he was never involved in the operation other</p> <p>11 than funding it.</p> <p>12 Q. Did the DA tell you that, or are</p> <p>13 you --</p> <p>14 A. No. I figured that out because the</p> <p>15 subpoenas were addressed to me.</p> <p>16 MR. SELLIER: Do you want to -- it's</p> <p>17 up to you. I mean "target" is a term of</p> <p>18 art. I don't know if he understands it or</p> <p>19 not. You might want to explain it to him.</p> <p>20 Up to you.</p> <p>21 MR. WANGSGARD: Sure, we can touch on</p> <p>22 that.</p> <p>23 BY MR. WANGSGARD:</p> <p>24 Q. So when you say the subpoenas were</p> <p>25 addressed to you, were they addressed to you in</p>	<p style="text-align: right;">Page 41</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 understanding of what that would mean?</p> <p>3 A. My understanding is that they</p> <p>4 stumbled over some payments and the wire</p> <p>5 transfers and transactions, which they thought</p> <p>6 were suspicious in the sense that millions of</p> <p>7 dollars were coming to my organization's</p> <p>8 accounts from overseas and then went back to</p> <p>9 overseas, to other accounts. So they thought,</p> <p>10 again my understanding, it was suspicious, and</p> <p>11 they decided to look into this. And just by the</p> <p>12 substance of the subpoenas, I understood that</p> <p>13 the real person of interest was Berezovsky.</p> <p>14 Q. Did anybody from the government tell</p> <p>15 you personally that you were a subject, using</p> <p>16 the term "subject" of the investigation?</p> <p>17 A. No.</p> <p>18 Q. Did anybody from the government tell</p> <p>19 you personally that you were a target of the</p> <p>20 investigation?</p> <p>21 A. No.</p> <p>22 Q. Did anybody from the government tell</p> <p>23 you personally that you were a witness in the</p> <p>24 investigation?</p> <p>25 A. Well, you have to define "witness."</p>



<p style="text-align: right;">Page 42</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 I received subpoenas to produce documents, and</p> <p>3 that's all that was to it.</p> <p>4 Q. But my question is more did someone</p> <p>5 with the government use the specific term "We</p> <p>6 view you as a witness"?</p> <p>7 A. No, I don't think so, if I remember</p> <p>8 correctly.</p> <p>9 Q. Did anybody associated with the</p> <p>10 government tell you that the IFCL was a subject</p> <p>11 of the investigation, specifically in terms</p> <p>12 of --</p> <p>13 A. IFCL was mentioned in the subpoena,</p> <p>14 so they asked to produce, you know, phone</p> <p>15 records and bank account and so on, but not --</p> <p>16 among many other things.</p> <p>17 MR. SELLIER: Alex, let me just</p> <p>18 advise you on the record. Kendall asked</p> <p>19 you did anyone tell you that the IFCL was a</p> <p>20 subject, I believe was the question.</p> <p>21 A. No.</p> <p>22 MR. SELLIER: That's all he asked</p> <p>23 you.</p> <p>24 THE WITNESS: I see.</p> <p>25 MR. SELLIER: It's a yes or no</p>	<p style="text-align: right;">Page 44</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 discuss that those three terms have very</p> <p>3 specific meanings in what I'll call my world, so</p> <p>4 we'll set those aside.</p> <p>5 But just I want to understand, when</p> <p>6 you're describing it, you're describing IFCL as</p> <p>7 a recipient of a subpoena from the DA seeking</p> <p>8 certain transactional records, financial</p> <p>9 records, and you might have copies of those</p> <p>10 subpoenas still. Is that correct?</p> <p>11 A. Yes. I think I was the recipient of</p> <p>12 the subpoenas.</p> <p>13 Q. Did you provide any testimony at any</p> <p>14 point in connection with those subpoenas?</p> <p>15 A. I think that there was a written</p> <p>16 statement that I compiled, and it was produced</p> <p>17 by my lawyers to the DA.</p> <p>18 Q. But you didn't -- did you sit down</p> <p>19 with prosecutors at any point in a conference</p> <p>20 room in lower Manhattan or anywhere else and --</p> <p>21 A. No.</p> <p>22 Q. -- speak with them?</p> <p>23 A. No.</p> <p>24 Q. Would you have a copy of that written</p> <p>25 statement that was compiled and produced to</p>
<p style="text-align: right;">Page 43</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 question.</p> <p>3 A. No.</p> <p>4 MR. SELLIER: He knows that there was</p> <p>5 a subpoena. He just asked you a very</p> <p>6 straightforward yes or no question.</p> <p>7 A. No, nobody identified me or IFCL, to</p> <p>8 the best of my recollection, that we either is a</p> <p>9 target of an investigation.</p> <p>10 BY MR. WANGSGARD:</p> <p>11 Q. Okay. So that was my next question.</p> <p>12 So no to using the term "subject,"</p> <p>13 you or IFCL. Is that correct?</p> <p>14 A. Yes. I will -- I think I have those</p> <p>15 subpoenas some place, so I can go and look,</p> <p>16 double-check.</p> <p>17 Q. And no one used the term "target"</p> <p>18 referring to either you or IFCL with respect to</p> <p>19 this Manhattan DA investigation?</p> <p>20 A. No.</p> <p>21 Q. And then how about referring to IFCL</p> <p>22 as a witness and using the specific term</p> <p>23 "witness"?</p> <p>24 A. No. I don't think so, no.</p> <p>25 Q. Perhaps some other time we can</p>	<p style="text-align: right;">Page 45</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 them?</p> <p>3 A. Well, I think -- I have to go in the</p> <p>4 basement and look in all these old boxes, but</p> <p>5 I'm pretty sure it should be there.</p> <p>6 Q. Were you ever called in to a Grand</p> <p>7 Jury proceeding for testimony?</p> <p>8 A. No.</p> <p>9 Q. Was anyone else associated with IFCL,</p> <p>10 to your knowledge, asked to provide testimony?</p> <p>11 A. No, that I know of.</p> <p>12 Q. Do you know if --</p> <p>13 MR. SELLIER: Kendall, wait. When</p> <p>14 you're done with this line of questioning,</p> <p>15 can we take a five-minute break?</p> <p>16 MR. WANGSGARD: Yeah, I think that</p> <p>17 makes sense. We've been on for about an</p> <p>18 hour, so let me just ask like a couple more</p> <p>19 questions on this and then we'll take a</p> <p>20 break.</p> <p>21 MR. SELLIER: Sure.</p> <p>22 BY MR. WANGSGARD:</p> <p>23 Q. Do you know if Mr. Berezovsky was --</p> <p>24 received a subpoena?</p> <p>25 A. No, I think he didn't.</p>



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<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Do you know if he provided testimony</p> <p>3 or any other information to the government?</p> <p>4 A. No, I'm sure he didn't. He was not</p> <p>5 in the United States. He was in UK.</p> <p>6 Q. If you're able to locate those</p> <p>7 documents, I think I would like to have them</p> <p>8 produced.</p> <p>9 MR. WANGSGARD: So I think I'll</p> <p>10 follow up with Randy on that one, but I</p> <p>11 think the subpoenas and the written</p> <p>12 testimonial document that was compiled and</p> <p>13 produced might be relevant. So I'm just</p> <p>14 going to put that on the record as a</p> <p>15 production request that we can discuss</p> <p>16 after, and then let's take a five-minute</p> <p>17 break.</p> <p>18 MR. SELLIER: Yeah, I'm going to</p> <p>19 guess that there may be some other similar</p> <p>20 documents that are mentioned that you asked</p> <p>21 for, but, anyway, at the end of the</p> <p>22 deposition, send me a note and I will</p> <p>23 follow up.</p> <p>24 MR. WANGSGARD: Absolutely.</p> <p>25 MR. SELLIER: So we will take our</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 BY MR. WANGSGARD:</p> <p>3 Q. So I want to direct your attention to</p> <p>4 Item 1 here, if you'd like to take a chance to</p> <p>5 read that. I'll read it out loud:</p> <p>6 "All documents supporting the</p> <p>7 contention that the actions of Channel One</p> <p>8 Russia have caused Goldfarb 'harm.' See,</p> <p>9 e.g., Complaint Paragraph 9."</p> <p>10 Mr. Goldfarb, do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. Did you review your files for</p> <p>13 documents responsive to this request?</p> <p>14 A. Yes.</p> <p>15 Q. Did you provide those to your lawyer?</p> <p>16 A. Yes, I produced them through my</p> <p>17 lawyer.</p> <p>18 Q. Were there any other documents not</p> <p>19 produced that are responsive to Item Number 1</p> <p>20 here?</p> <p>21 A. No.</p> <p>22 Q. And so referring to Item Number 2,</p> <p>23 which I'll read:</p> <p>24 "All documents supporting the</p> <p>25 contention that the actions of Channel One</p>
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<p>1 ALEXANDER GOLDFARB</p> <p>2 five-minute break now.</p> <p>3 (Recess taken at 10:30 a.m.)</p> <p>4 (Back on the record at 10:38 a.m.)</p> <p>5 MR. WANGSGARD: Back on the record at</p> <p>6 about 10:38.</p> <p>7 BY MR. WANGSGARD:</p> <p>8 Q. So I think we left off having asked</p> <p>9 some questions about the IFCL, which I might</p> <p>10 touch on later, but I want to move on to</p> <p>11 Exhibit A or Exhibit 1.</p> <p>12 MR. WANGSGARD: I called it A, but I</p> <p>13 don't actually know how we want to</p> <p>14 designate it, if there's a --</p> <p>15 MR. SELLIER: It can be letters if</p> <p>16 you want.</p> <p>17 MR. WANGSGARD: I think I gave you</p> <p>18 tab numbers, so let's use letters here for</p> <p>19 clarity.</p> <p>20 BY MR. WANGSGARD:</p> <p>21 Q. So Exhibit A, which is in front of</p> <p>22 us, and I'm going to skip down --</p> <p>23 MR. WANGSGARD: I'm trying to click</p> <p>24 the wrong screen, sorry. It's not going to</p> <p>25 work.</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 Russia have caused Goldfarb 'significant</p> <p>3 actual damages.' See, e.g., Complaint</p> <p>4 Paragraph 9."</p> <p>5 Do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. Did you review your files for any</p> <p>8 documents responsive to that Item Number 2?</p> <p>9 A. Yes, I did.</p> <p>10 Q. Did you provide those to your lawyer?</p> <p>11 A. Whatever I provided, I provided</p> <p>12 through my lawyer.</p> <p>13 Q. Any other items, you know, in your</p> <p>14 files that you didn't provide?</p> <p>15 A. No.</p> <p>16 Q. Item Number 3:</p> <p>17 "All documents supporting the</p> <p>18 contention that 'Dr. Goldfarb enjoys a</p> <p>19 considerable public standing in Russia and</p> <p>20 around the world, including the</p> <p>21 United States.' See Complaint</p> <p>22 Paragraph 108."</p> <p>23 Do you see what I'm referring to</p> <p>24 there?</p> <p>25 A. Yes.</p>



<p style="text-align: right;">Page 50</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Did you review files and produce</p> <p>3 those to your lawyer in response to that item?</p> <p>4 A. Yes.</p> <p>5 Q. Anything in your files that you</p> <p>6 didn't produce?</p> <p>7 A. There were too many, but I think</p> <p>8 whatever I produced cover the subject.</p> <p>9 Q. So when you say too many, I'm just</p> <p>10 curious what you mean.</p> <p>11 A. Well, there are hundreds of press</p> <p>12 clippings, for example. I didn't produce them</p> <p>13 all.</p> <p>14 Q. So you didn't endeavor to provide</p> <p>15 something in the public domain? Is that --</p> <p>16 A. Yes.</p> <p>17 Q. But in your personal documents that</p> <p>18 would support that contention --</p> <p>19 A. No. I provided everything.</p> <p>20 Q. Refer to Item Number 4, which I'll</p> <p>21 read:</p> <p>22 "All documents supporting the</p> <p>23 contention that the actions of Channel One</p> <p>24 Russia have 'caused Dr. Goldfarb public</p> <p>25 humiliation, embarrassment, and irreparable</p>	<p style="text-align: right;">Page 52</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Did you produce those through your</p> <p>3 lawyers?</p> <p>4 A. Yes.</p> <p>5 Q. Anything you -- any other documents</p> <p>6 that you didn't produce that would be responsive</p> <p>7 to the Item Number 5?</p> <p>8 A. No.</p> <p>9 Q. Refer to Paragraph 6, and I'll read</p> <p>10 it:</p> <p>11 "All documents supporting the</p> <p>12 contention that the actions of Channel One</p> <p>13 Russia have, quote, caused and will</p> <p>14 continue to cause profound emotional damage</p> <p>15 to Dr. Goldfarb, unquote. See Complaint</p> <p>16 Paragraph 113."</p> <p>17 Did you review your file for</p> <p>18 documents responsive to that Request Number 6?</p> <p>19 A. Yes.</p> <p>20 Q. Did you produce those through your</p> <p>21 lawyer?</p> <p>22 A. Yes.</p> <p>23 Q. Anything not produced that would be</p> <p>24 in your files?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 51</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 damage to his reputation.' See Complaint</p> <p>3 Paragraph 108."</p> <p>4 Do you see what I'm referring to</p> <p>5 there.</p> <p>6 A. Yes.</p> <p>7 Q. Did you review your files for</p> <p>8 documents responsive to that Item Number 4?</p> <p>9 A. Yes.</p> <p>10 Q. And you produced those through your</p> <p>11 lawyer?</p> <p>12 A. Yes.</p> <p>13 Q. Any other items in your files not</p> <p>14 produced?</p> <p>15 A. No.</p> <p>16 Q. I'm going to refer to Paragraph 5,</p> <p>17 which is -- and I'll read it:</p> <p>18 "All documents supporting the</p> <p>19 contention that the actions of Channel One</p> <p>20 Russia have 'caused Goldfarb particularly</p> <p>21 deep mental anguish and emotional</p> <p>22 distress.' See Complaint Paragraph 110."</p> <p>23 Did you review your files for</p> <p>24 documents responsive to that Item Number 5?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 53</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Have you reviewed your files and</p> <p>3 produced any documents supporting the, quote,</p> <p>4 profound emotional damage that you have</p> <p>5 suffered?</p> <p>6 A. Yes.</p> <p>7 Q. Any other documents supporting the</p> <p>8 profound emotional damage that you've not</p> <p>9 produced?</p> <p>10 A. No.</p> <p>11 Q. Have you produced all documents that</p> <p>12 you contend support the allegation that</p> <p>13 Channel One Russia acted with actual malice?</p> <p>14 A. Yes.</p> <p>15 Q. Have you withheld any documents that</p> <p>16 would support your contentions of actual malice?</p> <p>17 A. No.</p> <p>18 Q. Refer you to Paragraph 9, which I'll</p> <p>19 read:</p> <p>20 "All documents supporting the</p> <p>21 contention that 'defendants' wrongful</p> <p>22 conduct was intended to curry favor with</p> <p>23 the Russian government and thereby to</p> <p>24 obtain economic and other benefits.' See</p> <p>25 Complaint Paragraph 114."</p>

14 (Pages 50 to 53)



<p style="text-align: right;">Page 54</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Have you produced all documents</p> <p>3 responsive to this Item Number 9?</p> <p>4 A. Yes.</p> <p>5 Q. Have you withheld any documents that</p> <p>6 you rely on to support the allegations quoted in</p> <p>7 Paragraph 9?</p> <p>8 A. No.</p> <p>9 Q. Have you undertaken a review for all</p> <p>10 communications that you, Dr. Goldfarb, have had</p> <p>11 with other persons pertaining to, discussing,</p> <p>12 referencing, or otherwise regarding the</p> <p>13 allegations in the complaint? And obviously</p> <p>14 that's with exception of legal counsel.</p> <p>15 A. Yes.</p> <p>16 Q. Did you hold anything back?</p> <p>17 A. No.</p> <p>18 Q. Refer to Item Number 12, which I'll</p> <p>19 read, and it says:</p> <p>20 "All documents and communications</p> <p>21 (except with legal counsel) concerning</p> <p>22 Goldfarb's decision to bring this action."</p> <p>23 Have you produced and undertaken to</p> <p>24 review your files and produce all documents that</p> <p>25 you've had with others --</p>	<p style="text-align: right;">Page 56</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 amount of damages or the amount of judgment that</p> <p>3 you want to be awarded?</p> <p>4 A. No.</p> <p>5 Q. Do you care what the amount of</p> <p>6 judgment is that's entered?</p> <p>7 A. Of course I care, but this is</p> <p>8 secondary to my goals.</p> <p>9 Q. What are the primary or first goals?</p> <p>10 A. The primary is to get the truth out</p> <p>11 that I was defamed.</p> <p>12 Q. So you say that of course you care</p> <p>13 what the value of the judgment is. In what way</p> <p>14 do you care?</p> <p>15 A. I would say that if I get a monetary</p> <p>16 judgment, I would be happy.</p> <p>17 Q. With any magnitude of monetary</p> <p>18 judgment or...</p> <p>19 A. No. As I said in the complaint, I</p> <p>20 leave it to the Court to decide, but the more</p> <p>21 the better.</p> <p>22 Q. The more the better in what way?</p> <p>23 Because more money is more money or because, you</p> <p>24 know, it carries additional gravitas? What's</p> <p>25 the --</p>
<p style="text-align: right;">Page 55</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. Yes.</p> <p>3 Q. -- concerning this Paragraph 12?</p> <p>4 A. Yes.</p> <p>5 Q. And the items referenced in</p> <p>6 Paragraph 12, namely your decision to bring this</p> <p>7 action and the reasons for it, I guess?</p> <p>8 A. Yes.</p> <p>9 Q. Have you had any discussions with</p> <p>10 anyone else about your goals of this</p> <p>11 litigation -- other than legal counsel</p> <p>12 obviously -- what you hope to achieve?</p> <p>13 A. I have hoped to achieve a judgment in</p> <p>14 my favor.</p> <p>15 Q. A monetary judgment?</p> <p>16 A. Sorry?</p> <p>17 Q. A monetary judgment, sort of dollars</p> <p>18 and cents?</p> <p>19 A. Not a specific amount, if I remember</p> <p>20 correctly, at the time of the complaint. I left</p> <p>21 it for the court to decide.</p> <p>22 Q. Between -- you know, we'll touch on</p> <p>23 that a little bit later, but I guess my question</p> <p>24 is, have you had discussions with other people</p> <p>25 other than your lawyers with regard to the</p>	<p style="text-align: right;">Page 57</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. Well, more money is better than less</p> <p>3 money. I think it's obvious.</p> <p>4 Q. Sure. Are there other reasons why a</p> <p>5 larger judgment other than dollars and cents has</p> <p>6 a benefit to you?</p> <p>7 A. Well, to the extent it adds to the</p> <p>8 impact of the judgment. And the other goal of</p> <p>9 mine, that is, to get the truth out in public</p> <p>10 perception, the large judgment is evidence of</p> <p>11 the gravity of defamation, in my view.</p> <p>12 Q. Are you familiar -- and not</p> <p>13 necessarily on a personal basis, but are you</p> <p>14 familiar with the recording artist Taylor Swift?</p> <p>15 A. No. Oh, I've heard the name, of</p> <p>16 course. She's a singer.</p> <p>17 Q. Yes, a pop country singer, if I'm not</p> <p>18 mistaken.</p> <p>19 A. Yes, I've heard something.</p> <p>20 Q. Are you aware of her relatively</p> <p>21 recent lawsuit in which she sought and obtained</p> <p>22 damages of \$1 against -- I don't know if it was</p> <p>23 a commercial dispute or what it was, but Taylor</p> <p>24 Swift sued and achieved a judgment of \$1?</p> <p>25 A. No, I'm not familiar with that.</p>



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<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Did you ever think for suing for \$1</p> <p>3 in damages?</p> <p>4 A. Well, it wouldn't have covered my</p> <p>5 expenses, I guess, so...</p> <p>6 Q. I guess damages. The judgment,</p> <p>7 separate from legal costs and fees, of a dollar.</p> <p>8 A. No, I never considered suing for \$1.</p> <p>9 Q. So referring back to Exhibit A on the</p> <p>10 screen, Item Number 13, which I'll represent</p> <p>11 that we limit it to the issues in the complaint,</p> <p>12 but it reads all communications between yourself</p> <p>13 and Marina Litvinenko.</p> <p>14 Have you produced all communications</p> <p>15 between you and Marina Litvinenko as related to</p> <p>16 this complaint?</p> <p>17 A. Yes.</p> <p>18 Q. Anything held back?</p> <p>19 A. No.</p> <p>20 Q. How did you identify the documents</p> <p>21 that you would produce?</p> <p>22 A. Well, as I mentioned, I ran the</p> <p>23 search using keywords, search words, and</p> <p>24 whatever came up I produced.</p> <p>25 Q. Whatever came up in the email,</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Do you use it to communicate with</p> <p>3 her?</p> <p>4 A. Occasionally.</p> <p>5 Q. Do you maintain those WhatsApp</p> <p>6 messages?</p> <p>7 A. I do, but I mostly use WhatsApp for</p> <p>8 voice communications.</p> <p>9 Q. Do you use any other messaging</p> <p>10 services such as Signal?</p> <p>11 A. No, no Signal.</p> <p>12 Q. Any of the other ones that I haven't</p> <p>13 named?</p> <p>14 A. Facebook Messenger I use</p> <p>15 occasionally, very rarely.</p> <p>16 Q. And did you review the various</p> <p>17 non-email methods of communicating with</p> <p>18 Ms. Litvinenko? Did you review those for</p> <p>19 responsiveness to Item Number 13 in Exhibit A?</p> <p>20 A. No, because I know there's no</p> <p>21 substantive content there which might be</p> <p>22 responsive.</p> <p>23 Q. So at no point -- let me rephrase</p> <p>24 that.</p> <p>25 If I'm understanding you, you know</p>
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<p>1 ALEXANDER GOLDFARB</p> <p>2 correct?</p> <p>3 A. Yes.</p> <p>4 Q. Did you communicate with her, Marina</p> <p>5 Litvinenko, through other means such as text</p> <p>6 message, WhatsApp, Signal?</p> <p>7 A. WhatsApp? No. Really -- I may have</p> <p>8 some text messages on unrelated matters.</p> <p>9 Everything which has some substance to it is via</p> <p>10 email.</p> <p>11 Q. I guess the question is, did -- are</p> <p>12 you saying that sitting here today based on</p> <p>13 recollection, or did you actually look at your</p> <p>14 text messages with her --</p> <p>15 A. No, I didn't look into my text</p> <p>16 messages because I know that I don't discuss any</p> <p>17 substantial matters with her over text.</p> <p>18 Q. And when you say text, is that, you</p> <p>19 know, text messages on your phone; SMS, as</p> <p>20 we call it?</p> <p>21 A. Yes. It's usually short messages,</p> <p>22 very kind of day-to-day messages like arrival</p> <p>23 time, departure time, that sort of thing.</p> <p>24 Q. Do you use WhatsApp?</p> <p>25 A. I use WhatsApp, yes.</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 but haven't reviewed the messages that you've</p> <p>3 never communicated with her outside of email</p> <p>4 about the death of her husband?</p> <p>5 A. Please say it again?</p> <p>6 Q. Other than email, have you</p> <p>7 communicated with her regarding the death of her</p> <p>8 husband via text message or other non-email</p> <p>9 communications?</p> <p>10 A. Only voice communications.</p> <p>11 Q. Other than email or voice, have you</p> <p>12 communicated with her regarding the four</p> <p>13 episodes aired by Channel One that form the</p> <p>14 basis of your complaint?</p> <p>15 A. No.</p> <p>16 Q. Other than email or voice, have you</p> <p>17 communicated with her regarding the allegation</p> <p>18 by Walter Litvinenko that you poisoned his son,</p> <p>19 her husband?</p> <p>20 A. No. I might clarify, I might have</p> <p>21 sent her the link to the program over text, but</p> <p>22 that mostly.</p> <p>23 Q. Sitting here today, is it your</p> <p>24 recollection that other than email or voice,</p> <p>25 you've not communicated with Marina Litvinenko</p>



<p style="text-align: right;">Page 62</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 regarding the issues in the complaint? Which</p> <p>3 are broad, I will say.</p> <p>4 A. It's a very broad question. I do not</p> <p>5 remember anything, but it's probably irrelevant</p> <p>6 or unrelated, something minor.</p> <p>7 Q. Probably, but you haven't</p> <p>8 specifically, in response to Item Number 13 in</p> <p>9 Exhibit Number A, reviewed those to verify. Is</p> <p>10 that correct?</p> <p>11 A. As I said, I am pretty sure that I do</p> <p>12 not use this means of communications to convey</p> <p>13 anything of substance, so I did not review them.</p> <p>14 Q. How often do you communicate with her</p> <p>15 in methods that are neither email, nor voice?</p> <p>16 So text, WhatsApp, Facebook Messenger, or</p> <p>17 others, how frequent?</p> <p>18 A. Not very often. Maybe once a week</p> <p>19 such as "I cannot reach you by phone." Usually</p> <p>20 we converse on the phone or over voice.</p> <p>21 Q. I'm going to direct your attention to</p> <p>22 Paragraph 18 of Exhibit A, which I'll read:</p> <p>23 "All documents Goldfarb contends</p> <p>24 support the claims for losses, harm, and</p> <p>25 other damages."</p>	<p style="text-align: right;">Page 64</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 supporting a claim for at least 10 million</p> <p>3 dollars?</p> <p>4 A. Yes.</p> <p>5 Q. Anything you haven't produced that</p> <p>6 supports a claim of at least 10 million dollars?</p> <p>7 A. No.</p> <p>8 Q. I'll direct your attention to</p> <p>9 Paragraph 27, which I'll read:</p> <p>10 "All documents reflecting statements</p> <p>11 or positions Goldfarb has taken regarding</p> <p>12 the government of the Russian Federation,</p> <p>13 any political subdivisions or apparatuses</p> <p>14 of the government of the Russian</p> <p>15 Federation, or Defendant Channel One</p> <p>16 Russia."</p> <p>17 Have you produced all documents that</p> <p>18 reflect statements or positions that you've</p> <p>19 taken regarding the government of Russia?</p> <p>20 A. If you exclude documents that are in</p> <p>21 the public domain, yes, but there were too many</p> <p>22 in the public domain which I could reasonably</p> <p>23 search and produce.</p> <p>24 Q. Have you produced all documents other</p> <p>25 than those in the public domain regarding</p>
<p style="text-align: right;">Page 63</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Have you provided all documents that</p> <p>3 you contend support your claims for losses,</p> <p>4 harm, and other damages?</p> <p>5 A. Yes.</p> <p>6 Q. Anything you're relying on for</p> <p>7 losses, harm, or other damages that's not been</p> <p>8 produced?</p> <p>9 A. No.</p> <p>10 Q. Have you produced all documents</p> <p>11 relating to your calculation of your alleged</p> <p>12 damages?</p> <p>13 A. Yes.</p> <p>14 Q. Directing your attention to</p> <p>15 Paragraph 20, which I'll read:</p> <p>16 "All documents supporting the</p> <p>17 contention that 'plaintiff seeks</p> <p>18 compensatory damages for the emotional</p> <p>19 distress, mental suffering, embarrassment,</p> <p>20 humiliation, and reputational damages</p> <p>21 caused by Channel One's defamatory acts of</p> <p>22 at least 10 million' as detailed in</p> <p>23 plaintiff's initial disclosures dated</p> <p>24 June 24th, 2021."</p> <p>25 Have you produced all documents</p>	<p style="text-align: right;">Page 65</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 positions that you've taken regarding</p> <p>3 Channel One Russia?</p> <p>4 A. Yes.</p> <p>5 Q. Do you have an opinion on Channel One</p> <p>6 Russia?</p> <p>7 A. Do I have an opinion?</p> <p>8 Q. Yes.</p> <p>9 A. I do, yes.</p> <p>10 Q. What is that opinion?</p> <p>11 A. That this is a propaganda operation</p> <p>12 by serving in the interests of the Russian</p> <p>13 government and spreading lies and fake news,</p> <p>14 which are -- mostly around the world, which are</p> <p>15 politically motivated on various issues.</p> <p>16 Q. I might come back to that, but I'll</p> <p>17 move on to Paragraph 28, which I'll read:</p> <p>18 "Documents sufficient to identify any</p> <p>19 organizations of which Goldfarb is a member</p> <p>20 or with which he is otherwise affiliated</p> <p>21 that have made statements or taken</p> <p>22 positions regarding the government of the</p> <p>23 Russian Federation, any political</p> <p>24 subdivisions or apparatuses of the</p> <p>25 government of the Russian Federation, or</p>



<p style="text-align: right;">Page 66</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Defendant Channel One Russia."</p> <p>3 Did you undertake to review and</p> <p>4 produce documents in response to Paragraph 28?</p> <p>5 A. Yes.</p> <p>6 Q. Did you produce those through your</p> <p>7 lawyers?</p> <p>8 A. Yes.</p> <p>9 Q. Any that you haven't produced?</p> <p>10 A. No.</p> <p>11 Q. And then last paragraph we'll look at</p> <p>12 is Paragraph 31 on Exhibit A, which I'll read:</p> <p>13 "To the extent not otherwise produced</p> <p>14 in response to the foregoing requests, all</p> <p>15 documents which support, evidence, refute,</p> <p>16 or otherwise relate to Goldfarb's claims in</p> <p>17 this action."</p> <p>18 Did you undertake, notwithstanding</p> <p>19 Paragraphs 1 through 30 of this exhibit, to</p> <p>20 produce all documents which support, evidence,</p> <p>21 refute, or otherwise relate to your claims?</p> <p>22 A. Yes, I did.</p> <p>23 Q. But perhaps not text messages?</p> <p>24 A. Well, everything that I found, I</p> <p>25 would say.</p>	<p style="text-align: right;">Page 68</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 employed by an outside -- you know,</p> <p>3 non-self-employment, so a third party?</p> <p>4 A. I was employed by a research</p> <p>5 institute until 2006. That is the time of</p> <p>6 Litvinenko's death, a little bit later. And</p> <p>7 since then, I was technically employed by IFCL</p> <p>8 until -- as long as it was in operation. That</p> <p>9 means probably until 2010 or '11.</p> <p>10 Q. Since IFCL in 2010 or 2011, have you</p> <p>11 been employed by any outside -- any third</p> <p>12 parties?</p> <p>13 A. No.</p> <p>14 Q. Did you regard yourself as retired at</p> <p>15 that point?</p> <p>16 A. Yes.</p> <p>17 Q. What, if anything, is your current</p> <p>18 source of income or sources of income?</p> <p>19 A. My current source of income is</p> <p>20 savings and retirement benefits and some income</p> <p>21 from writing.</p> <p>22 Q. Is that current writing or income</p> <p>23 from the book?</p> <p>24 A. It's income from the book.</p> <p>25 Occasional consulting, but very little.</p>
<p style="text-align: right;">Page 67</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Are you currently employed?</p> <p>3 A. No.</p> <p>4 Q. Are you retired?</p> <p>5 A. Yes.</p> <p>6 Q. When did you retire?</p> <p>7 A. Does self-employment count, no?</p> <p>8 Q. Well, let's break it up. When --</p> <p>9 were you self-employed for a period of time?</p> <p>10 A. Yes.</p> <p>11 Q. When?</p> <p>12 A. I was self-employed in the sense that</p> <p>13 I'm an author of a book which was optioned to</p> <p>14 dramatize as a movie, and in that capacity, I</p> <p>15 got some income which is reported as</p> <p>16 self-employment income.</p> <p>17 Q. So in that sense, obviously being an</p> <p>18 author is an ongoing -- once you're an author,</p> <p>19 you're always an author. Is that fair to say?</p> <p>20 A. (No response.)</p> <p>21 Q. So presumably you're currently</p> <p>22 self-employed as an author. Is that accurate?</p> <p>23 A. Yeah. You can say so, yeah. Not</p> <p>24 that I make a lot of money, but...</p> <p>25 Q. When's the last time you were</p>	<p style="text-align: right;">Page 69</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. When's the last time you consulted?</p> <p>3 A. I would say again it's related to the</p> <p>4 film production, but probably 2018.</p> <p>5 Q. And who was the client?</p> <p>6 A. It was a British production company</p> <p>7 which tries to develop film based on my book.</p> <p>8 Q. Have you done any consulting aside</p> <p>9 from consulting related to the subject matter of</p> <p>10 your book?</p> <p>11 A. No.</p> <p>12 Oh, one more source of income, sorry.</p> <p>13 I sold my archive, personal archive and</p> <p>14 correspondence, to Columbia University last</p> <p>15 year. I don't know whether it's income or</p> <p>16 capital gain, but whatever it is, it was some</p> <p>17 money.</p> <p>18 Q. So what do you mean when you say</p> <p>19 personal archive?</p> <p>20 A. Well, I have accumulated many emails,</p> <p>21 documents, and correspondence and drafts and</p> <p>22 articles over the past 30 years, and they</p> <p>23 expressed interest, and so I collected all of</p> <p>24 this in the boxes and shipped it to them. They</p> <p>25 paid some money. The Goldfarb archive.</p>



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<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. And who -- when you say "them," you</p> <p>3 mean Columbia University?</p> <p>4 A. Yes. It's called Bakhmetiev Archive.</p> <p>5 It's one of the Russian-related archives of</p> <p>6 Columbia University.</p> <p>7 Q. Is there a specific individual or</p> <p>8 individuals that you worked with on selling this</p> <p>9 archive?</p> <p>10 A. Yes. The curator.</p> <p>11 Q. Does he or she have a name?</p> <p>12 A. She has a name. Her name is Tatiana</p> <p>13 and her last name is Chebotarev,</p> <p>14 C-H-E-B-O-T-A-R-E-V.</p> <p>15 Q. And approximately how much did</p> <p>16 Columbia University pay for your archive?</p> <p>17 A. \$18,000.</p> <p>18 Q. One eight?</p> <p>19 A. One eight.</p> <p>20 Q. Did you maintain copies of the items</p> <p>21 in the archive?</p> <p>22 A. No. It was mostly printed archives.</p> <p>23 I mean some of it were printouts from my laptop,</p> <p>24 but -- in that sense, I do have copies, but not</p> <p>25 all of it.</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 through all those documents and read them. It</p> <p>3 will take you probably a long time, but you will</p> <p>4 pull out whatever interests you.</p> <p>5 Q. And do you recall when you received</p> <p>6 the \$18,000 for your archives?</p> <p>7 A. Sometime late last year.</p> <p>8 Q. And do you recall when you physically</p> <p>9 handed off the documents or put them in the</p> <p>10 mail?</p> <p>11 A. I would say around September, October</p> <p>12 last year.</p> <p>13 Q. Did you review those documents for</p> <p>14 responsiveness to the items listed in Exhibit A</p> <p>15 that we looked at before sending them off to</p> <p>16 Columbia?</p> <p>17 A. Everything that is printed out from</p> <p>18 my laptop has been reviewed in the search.</p> <p>19 Responsiveness, whatever is the hard copies is</p> <p>20 the old -- relates to the old times which</p> <p>21 predate the issues that we are concerned with,</p> <p>22 so I didn't.</p> <p>23 Q. So when you say old times, how -- I</p> <p>24 mean I'm curious --</p> <p>25 A. 2000 -- '90s, early '20s.</p>
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<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Approximately how many boxes worth of</p> <p>3 material are we talking about? I mean you said</p> <p>4 you boxed it up. Is that correct? Anything in</p> <p>5 hard copy you put in boxes --</p> <p>6 A. Yeah. It was about probably 11 or 12</p> <p>7 regular-size boxes, probably 30, 40,000 pages.</p> <p>8 Q. Do you know what Columbia intends to</p> <p>9 do with those 30 or 40,000 pages?</p> <p>10 A. As far as I understand, they just</p> <p>11 keep it and list it in their catalogs in case</p> <p>12 that somebody wants to research the period and</p> <p>13 the individuals and so on.</p> <p>14 Q. Did they digitize that? Do you know?</p> <p>15 A. I don't think so.</p> <p>16 Q. So if I wanted to review any given</p> <p>17 page from those 11 or 12 boxes, what's your</p> <p>18 understanding of how I would do that?</p> <p>19 A. I would -- well, now they're closed</p> <p>20 because of COVID, but once they open, they --</p> <p>21 you would probably write -- like any other</p> <p>22 university archives, you will write a letter to</p> <p>23 the curator, explain your need, and they will</p> <p>24 give you access. And you would sit there, or</p> <p>25 one of your colleagues, and manually look</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. The late 1990s and the early 2000s.</p> <p>3 A. Yes.</p> <p>4 Q. There are documents in the personal</p> <p>5 archive during that period that you --</p> <p>6 A. Yes, it mostly predates Litvinenko</p> <p>7 murder.</p> <p>8 Q. Any documents related to this lawsuit</p> <p>9 that would have been in --</p> <p>10 A. No.</p> <p>11 Q. -- (indiscernible) to Columbia?</p> <p>12 A. No.</p> <p>13 (Reporter clarification.)</p> <p>14 Q. Any documents related to this lawsuit</p> <p>15 that you sold to Columbia?</p> <p>16 A. No.</p> <p>17 Q. Is there a reason why you sold the</p> <p>18 archive?</p> <p>19 A. Because I'm an old guy, and when I</p> <p>20 die, nobody would be interested in this, I</p> <p>21 presume. And if anybody were, it would be</p> <p>22 better preserved and made available, you know,</p> <p>23 by a formal archive.</p> <p>24 Q. Did you approach Columbia or did</p> <p>25 Columbia approach you for the transaction?</p>



<p style="text-align: right;">Page 74</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. Well, it's a kind of a word-of-mouth,</p> <p>3 you know, grapevine that they're buying those</p> <p>4 kind of things. I'm not the only one who is in</p> <p>5 their archive, of course. It's an established</p> <p>6 archive dating back probably a hundred years.</p> <p>7 And I think they approached me, yes.</p> <p>8 Or maybe I wrote to them and offered it. I</p> <p>9 don't remember.</p> <p>10 Q. Do you know why they were interested</p> <p>11 in your materials?</p> <p>12 A. Well, these materials relate to</p> <p>13 myself and many public figures, such as George</p> <p>14 Soros, for example, Berezovsky, and others in</p> <p>15 that ar- -- in that -- things the programs that</p> <p>16 were carried out by the IFCL, which cover a good</p> <p>17 portion of the modern history of the Eastern</p> <p>18 Europe, Russia, Ukraine. So I guess that was</p> <p>19 the reason.</p> <p>20 Q. And does Columbia, to your knowledge,</p> <p>21 have specific archive programs such as yours</p> <p>22 relating to Eastern Europe or Russia?</p> <p>23 A. Well, actually, the way it happened,</p> <p>24 I was first contacted by the archive of the</p> <p>25 Stanford University, and they came, reviewed the</p>	<p style="text-align: right;">Page 76</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. And they came and actually looked at</p> <p>3 the documents that you --</p> <p>4 A. Yes, they came in. I pulled out the</p> <p>5 boxes, they listed through it, and they said</p> <p>6 what -- "We will send a car," and I said how</p> <p>7 much -- what about the payment. They said, "No,</p> <p>8 we will get it free," and then I thought, no,</p> <p>9 perhaps I could find something better and I</p> <p>10 contacted Columbia.</p> <p>11 Q. Do you know if Columbia -- if the</p> <p>12 project at Columbia or the archive at Columbia</p> <p>13 that purchased your documents is funded by -- do</p> <p>14 you know how that's funded, I guess?</p> <p>15 A. I think they have an endowment which</p> <p>16 goes back for hundred years.</p> <p>17 Q. Do you think that's a general</p> <p>18 endowment or specific to the --</p> <p>19 A. Specific. I think it's specific</p> <p>20 endowment.</p> <p>21 Q. Do you know what that's named?</p> <p>22 A. It's named Bakhmetiev Archive,</p> <p>23 B-A-K-H-M-E-T-I-E-V Archive, and it was endowed</p> <p>24 by Mr. Bakhmetiev, who was a politician and</p> <p>25 industrialist before the Bolshevik Revolution.</p>
<p style="text-align: right;">Page 75</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 documents, and they said, no, they're not</p> <p>3 interested.</p> <p>4 And then I got in touch with</p> <p>5 Columbia, and they got interested, so I think</p> <p>6 it's part of their purview. This particular</p> <p>7 archive deals with Russian political and</p> <p>8 cultural history, with an emphasis of the expat</p> <p>9 community.</p> <p>10 Q. So your experience and life history</p> <p>11 would be relevant to something that Columbia was</p> <p>12 interested in for their archive?</p> <p>13 A. Yes.</p> <p>14 Q. When did Stanford reach out to you?</p> <p>15 A. A couple of years ago. Actually they</p> <p>16 reached out to me in 2013 for the first time</p> <p>17 after the death of Berezovsky, asking whether</p> <p>18 they can purchase any documents related to</p> <p>19 Berezovsky, and I told them that I don't have</p> <p>20 any. I have my own which -- in which Berezovsky</p> <p>21 is featured prominently.</p> <p>22 And then it went on and off for a</p> <p>23 couple of years, and then -- so it was going on</p> <p>24 for a few years starting from Berezovsky's</p> <p>25 death. I believe it was 2013. Was it? Yes.</p>	<p style="text-align: right;">Page 77</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. So the subject matter of your</p> <p>3 personal documents is late '90- -- includes the</p> <p>4 late '90s and the early 2000s?</p> <p>5 A. Yes.</p> <p>6 Q. Would it go through say 2006?</p> <p>7 A. It may. I don't remember, to tell</p> <p>8 you the truth.</p> <p>9 Q. Did it include materials related to</p> <p>10 Alexander Litvinenko?</p> <p>11 A. It may touch upon it. I don't</p> <p>12 remember exactly. Maybe a couple letters or</p> <p>13 emails. If it has it, I must have produced</p> <p>14 those documents because they should surely come</p> <p>15 from my laptop.</p> <p>16 Q. Were you -- so you were still in</p> <p>17 possession of the 11 boxes in July 2021. Is</p> <p>18 that correct?</p> <p>19 A. Yes.</p> <p>20 Q. Did you review the 11 boxes of</p> <p>21 documents when responding to the requests that</p> <p>22 we looked at in Exhibit A?</p> <p>23 A. No. As I said, I reviewed the</p> <p>24 contents of my hard drive, and everything in</p> <p>25 that -- in those boxes which may have relation</p>



<p style="text-align: right;">Page 78</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 to this lawsuit should have -- be on the -- in</p> <p>3 the electronic form which I produced, so there</p> <p>4 was no reason to review that.</p> <p>5 Q. Were there any handwritten documents</p> <p>6 in the 11 boxes that you sold to Columbia?</p> <p>7 A. There may have been from an earlier</p> <p>8 time, from the '90s or maybe earlier -- no, from</p> <p>9 the whole period, but nothing at all related to</p> <p>10 this lawsuit.</p> <p>11 Q. So when you say related to this</p> <p>12 lawsuit, just tell me what you -- what your</p> <p>13 interpretation --</p> <p>14 A. Well, for example, as far as the IFCL</p> <p>15 is concerned, there might have been written</p> <p>16 requests for funding from various civil society</p> <p>17 groups in Russia which were handwritten and a</p> <p>18 form filled.</p> <p>19 Q. What about handwritten documents</p> <p>20 dated between 2000 and 2006?</p> <p>21 A. There may have been some documents</p> <p>22 handwritten, as I said, because the -- wait a</p> <p>23 minute. When did we finish with IFCL?</p> <p>24 No, no. Actually, no, it's all '90s.</p> <p>25 All these activities which were -- involved</p>	<p style="text-align: right;">Page 80</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Litvinenko, when he was either alive or not</p> <p>3 alive, in the 11 boxes of documents you sold to</p> <p>4 Columbia?</p> <p>5 A. I think there were documents</p> <p>6 definitely related to Litvinenko while he was</p> <p>7 alive, particularly when he was writing his</p> <p>8 books, but I don't remember if there were any</p> <p>9 related to his murder and death.</p> <p>10 In any event, they must be present in</p> <p>11 the electronic form on my hard disk, which I</p> <p>12 have produced.</p> <p>13 Q. And so when you refer to electronic</p> <p>14 documents, are you referring to documents that</p> <p>15 were created and -- originally created and</p> <p>16 stored electronically?</p> <p>17 A. Yeah, like emails.</p> <p>18 Q. But not scanned copies of what might</p> <p>19 have originally been --</p> <p>20 A. No.</p> <p>21 Q. -- handwritten --</p> <p>22 A. Emails. It's mostly correspondence.</p> <p>23 Q. Did Columbia express interest in</p> <p>24 the -- specific interest in the</p> <p>25 Litvinenko-related documents that might have</p>
<p style="text-align: right;">Page 79</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 interactions with the Russian civil society was</p> <p>3 in the '90s.</p> <p>4 Or, no, there may be. Sorry, I don't</p> <p>5 remember. The short answer, I don't remember.</p> <p>6 The long answer, it may be handwritten documents</p> <p>7 in the early 2000s which are not related to the</p> <p>8 lawsuit.</p> <p>9 Q. So, again, the question is, when you</p> <p>10 say related to the lawsuit, describe for me what</p> <p>11 class of documents in your mind --</p> <p>12 A. Well, as I said, the activities of</p> <p>13 IFCL was grant-making to various worthy</p> <p>14 recipients in and around Russia. And, for</p> <p>15 example, there were hundreds of requests to fund</p> <p>16 legal aid to Russian conscripts which were</p> <p>17 evading draft at the time of the second war in</p> <p>18 Chechnya. It was in 2000, 2001, so there were</p> <p>19 several hundred requests from various NGOs in</p> <p>20 Russia to give money to lawyers who would defend</p> <p>21 those kids who refuse to serve in Chechnya, and</p> <p>22 we were funding that. So all of these requests</p> <p>23 and then reports were submitted and handwritten</p> <p>24 according to a specific form.</p> <p>25 Q. Were there documents related to</p>	<p style="text-align: right;">Page 81</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 been --</p> <p>3 A. No.</p> <p>4 Q. -- in these archives?</p> <p>5 A. No.</p> <p>6 (Reporter clarification.)</p> <p>7 MR. SELLIER: Alex, remember the</p> <p>8 three-second rule that I gave you.</p> <p>9 THE WITNESS: Yes.</p> <p>10 MR. SELLIER: Okay.</p> <p>11 BY MR. WANGSGARD:</p> <p>12 Q. Listen to the question, absorb the</p> <p>13 question, understand the question, let me finish</p> <p>14 the question, all the good --</p> <p>15 MR. SELLIER: And wait three seconds</p> <p>16 before you answer.</p> <p>17 THE WITNESS: Yes, sir.</p> <p>18 BY MR. WANGSGARD:</p> <p>19 Q. Did you -- you know, for the \$18,000</p> <p>20 payment when Columbia purchased your archives,</p> <p>21 were there documents related to that, such as a</p> <p>22 purchase and sale agreement or a contract?</p> <p>23 A. There was an invoice I sent to them.</p> <p>24 Q. You sent them an invoice and they</p> <p>25 sent you a check?</p>



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<p>1 ALEXANDER GOLDFARB</p> <p>2 A. I sent them invoice, yes, and they</p> <p>3 sent me a check or a wire transfer, something.</p> <p>4 Q. Did anybody, either yourself or to</p> <p>5 your knowledge anybody associated with Columbia,</p> <p>6 create either an index or an inventory of the</p> <p>7 items in those 11 boxes?</p> <p>8 A. No. I created a short summary of the</p> <p>9 contents of these boxes.</p> <p>10 Q. When did you create that short</p> <p>11 summary?</p> <p>12 A. I first created it probably somewhere</p> <p>13 in 2000- -- or just before the pandemic, and --</p> <p>14 but I might have sent it to them. I created it</p> <p>15 when this whole process started, so I may have</p> <p>16 it some place still.</p> <p>17 Q. Did you create an inventory in 2013</p> <p>18 approximately when Stanford first reached out?</p> <p>19 A. I probably did it at that time, but</p> <p>20 then I might have edited it since, so the latest</p> <p>21 version would be in 2021.</p> <p>22 Q. Is that a handwritten list or a Word</p> <p>23 document? What is the inventory?</p> <p>24 A. It's a Word document.</p> <p>25 Q. Did you provide that inventory Word</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 A. I think it was 2019 or 2018, it was</p> <p>3 about \$40,000.</p> <p>4 Q. How about 2017?</p> <p>5 A. Probably nothing.</p> <p>6 Q. 2016?</p> <p>7 A. I have to look at year by year</p> <p>8 because this option agreement for dramatization</p> <p>9 included some payments, some option exercised,</p> <p>10 and it was spread over years. Altogether from</p> <p>11 2016 let's say until now, I received</p> <p>12 approximately 50 to 60,000 from them.</p> <p>13 Q. Do you have a schedule of those</p> <p>14 payments anywhere by year?</p> <p>15 A. I have a record.</p> <p>16 Q. How far back does that record go?</p> <p>17 A. I think we -- this particular one, we</p> <p>18 sold the option, it was 2015.</p> <p>19 Q. The book came out in 2007. Is that</p> <p>20 correct?</p> <p>21 A. Yes. Yes.</p> <p>22 Q. Who published the book?</p> <p>23 A. It's called Free Press. It's an</p> <p>24 imprint of Simon &amp; Schuster.</p> <p>25 Q. Was there an advance or other, you</p>
Page 83	Page 85
<p>1 ALEXANDER GOLDFARB</p> <p>2 document to Columbia?</p> <p>3 A. Yes.</p> <p>4 Q. Do you maintain a copy?</p> <p>5 A. Yes.</p> <p>6 Q. Would you be agreeable to producing a</p> <p>7 copy of that inventory to me?</p> <p>8 A. I have to review it. If it's</p> <p>9 responsive, yes.</p> <p>10 Q. I think before discussing the</p> <p>11 archive, we left off on sort of what your</p> <p>12 current employment is and I think that you said</p> <p>13 you were retired, currently retired, but an</p> <p>14 author. Is that correct?</p> <p>15 A. Yes.</p> <p>16 Q. Do you know how much income you</p> <p>17 received from your book in the calendar year</p> <p>18 2021?</p> <p>19 A. Nothing.</p> <p>20 Q. Nothing at all or --</p> <p>21 A. Nothing at all. It's an old book.</p> <p>22 Q. What about 2020?</p> <p>23 A. I have to look at my tax return. I</p> <p>24 don't remember. Very little.</p> <p>25 Q. How about 2019?</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 know, payment you received up front for writing</p> <p>3 the book?</p> <p>4 A. At the time, we received some money,</p> <p>5 yes, in 2007.</p> <p>6 Q. So if I wanted to understand sales of</p> <p>7 your book year to year and income that you've</p> <p>8 received from your book year to year, how would</p> <p>9 I do that?</p> <p>10 A. Well, my agent who sold the book is</p> <p>11 now dead, so I have no idea. But I can tell you</p> <p>12 the two of us, Marina and I, who are co-authors</p> <p>13 of the book, got an advance of half a million</p> <p>14 dollars at the time, 2006. We got an advance of</p> <p>15 half a million dollars, and that was it.</p> <p>16 All other income related to this</p> <p>17 book -- I mean there were sales, but they didn't</p> <p>18 cover the advance, so we didn't get anything</p> <p>19 more. Half a million 2006, which was split</p> <p>20 between us, so I received that means \$250,000</p> <p>21 less taxes, and then all other income related to</p> <p>22 this book were for -- was from selling the</p> <p>23 dramatization option, which was sold I believe</p> <p>24 twice or three times.</p> <p>25 It was sold -- I mean the option, the</p>



<p style="text-align: right;">Page 86</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 rights to the book, were sold in 2007 to a big</p> <p>3 studio, which paid us an option of another half</p> <p>4 a million dollars, which we split between the</p> <p>5 two of us. So another 250 in 2007, and nothing</p> <p>6 else for the next ten years or nine years.</p> <p>7 And then this project never</p> <p>8 materialized, so that option expired, and we</p> <p>9 sold it again to this British production</p> <p>10 company, the rights for the book, in 2016, if</p> <p>11 I'm not mistaken, with a schedule, and up until</p> <p>12 today, the two of us received approximately</p> <p>13 \$70,000, which was split, so that means that I</p> <p>14 got 35.</p> <p>15 So altogether since the publication,</p> <p>16 I received half a million \$35,000 over the 17 --</p> <p>17 16 years. That's it.</p> <p>18 Q. Do you or have you at any point</p> <p>19 received royalties from book sales?</p> <p>20 A. No. They never covered the advance.</p> <p>21 Q. So to this day, the book has not</p> <p>22 gotten to the point where the publisher would</p> <p>23 recover any advance, you know, and a royalty</p> <p>24 structure would kick in. Is that --</p> <p>25 A. Yes, yes, correct.</p>	<p style="text-align: right;">Page 88</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 an increase in sales or a decrease in sales</p> <p>3 following the Channel One programs at issue?</p> <p>4 A. I wouldn't.</p> <p>5 Q. Does either Simon &amp; Schuster or Free</p> <p>6 Press provide you any year-end documents as part</p> <p>7 of the contract?</p> <p>8 A. As I said, they were sending it to my</p> <p>9 agent for about ten years until he died, and</p> <p>10 then his agency closed and was taken over by</p> <p>11 another agency and then I lost track.</p> <p>12 Q. Was your agent forwarding those to</p> <p>13 you?</p> <p>14 A. My -- what was his name?</p> <p>15 Q. No. Was he forwarding you --</p> <p>16 A. Yes.</p> <p>17 Q. Was your agent, when he was alive,</p> <p>18 passing on to you --</p> <p>19 A. Yeah, he was passing me some</p> <p>20 financial statements which essentially said that</p> <p>21 there's no money coming in.</p> <p>22 Q. And when did he die?</p> <p>23 A. I have to look up. I think he died</p> <p>24 2000 and maybe '12 or '13.</p> <p>25 Q. Do you have any insight into how your</p>
<p style="text-align: right;">Page 87</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Are you kept apprised by the</p> <p>3 publisher of their quantity of their sales,</p> <p>4 copies sold?</p> <p>5 A. Well, it never reached me. It was</p> <p>6 kind of with the agent in London, but then the</p> <p>7 agent died, and I don't know what's happening</p> <p>8 with this. But I would presume that if there</p> <p>9 was some money, they would find me, would have</p> <p>10 found me.</p> <p>11 Q. But I guess if you wanted to know "In</p> <p>12 2021 how many copies did I sell, in 2020 how</p> <p>13 many copies did I sell, in 2019 how many copies</p> <p>14 did I sell," you don't have that information</p> <p>15 handy?</p> <p>16 A. No, I don't.</p> <p>17 Q. So would you know if say sales either</p> <p>18 went up, went down, or stayed level after March</p> <p>19 2018?</p> <p>20 A. I wouldn't know. I wouldn't know.</p> <p>21 If there were any significant amounts of money</p> <p>22 due to me, I would have known because somebody</p> <p>23 is managing the files of our agent. I think</p> <p>24 somebody takes care of it in London.</p> <p>25 Q. Would you know if the publisher had</p>	<p style="text-align: right;">Page 89</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 book has been doing on the shelves since 2013?</p> <p>3 A. The only insight is the sales on</p> <p>4 Amazon, which were not in any way anything of</p> <p>5 interest or significance. There were so many</p> <p>6 books about Litvinenko since then, that my book</p> <p>7 has faded into history.</p> <p>8 Q. When your agent closed, was he -- was</p> <p>9 his agency sold or absorbed by different</p> <p>10 entities?</p> <p>11 A. I think he was absorbed by a</p> <p>12 different entity.</p> <p>13 Q. Do you know who that is?</p> <p>14 A. Yeah.</p> <p>15 Q. Who's that?</p> <p>16 A. It's -- let me think.</p> <p>17 Curtis Brown.</p> <p>18 Q. And do you maintain contact with the</p> <p>19 Curtis Brown agency?</p> <p>20 A. I -- not with regard to that book.</p> <p>21 Q. And is Curtis Brown the name of the</p> <p>22 agency or of a person?</p> <p>23 A. Yeah, Curtis Brown, it's a major</p> <p>24 international literary agency, I think based</p> <p>25 on --</p>



<p style="text-align: right;">Page 90</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Are they currently your agent with</p> <p>3 respect to this book?</p> <p>4 A. I presume so. I don't know, frankly.</p> <p>5 Q. Do they provide you any sort of</p> <p>6 year-end schedule, quantity of books sold, or</p> <p>7 any other documents?</p> <p>8 A. Not that I remember.</p> <p>9 Q. Do you know if either Simon &amp;</p> <p>10 Schuster or Free Press have suffered sales of</p> <p>11 your book as a result of the Channel One</p> <p>12 programs?</p> <p>13 A. I don't know.</p> <p>14 Q. Do you know --</p> <p>15 A. Free Press doesn't exist any longer.</p> <p>16 It went -- it was dissolved some years ago, but</p> <p>17 Simon &amp; Schuster probably holds the rights.</p> <p>18 Q. Do you know for sure or...</p> <p>19 A. I know that Free Press doesn't exist,</p> <p>20 but it was a division of Simon &amp; Schuster, so</p> <p>21 somebody in Simon &amp; Schuster -- I mean if</p> <p>22 somebody comes to me and says that "We want</p> <p>23 something to do with your book," I would</p> <p>24 probably contact Simon &amp; Schuster and figure out</p> <p>25 who is in charge of that particular book.</p>	<p style="text-align: right;">Page 92</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 your agent before he passed away in 2012 or '13,</p> <p>3 contract?</p> <p>4 A. I never had a contract with him. It</p> <p>5 was all kind of oral, but I'm sure that in his</p> <p>6 files there is some sort of record.</p> <p>7 Q. Do you have a written agreement with</p> <p>8 Curtis Brown?</p> <p>9 A. No, no. I just have -- no, I have</p> <p>10 just from the public domain that they absorbed</p> <p>11 all the business of my previous agent.</p> <p>12 Q. Who is the studio, the original</p> <p>13 studio, that had a ten-year option on the</p> <p>14 dramatization rights?</p> <p>15 A. No, it was less than ten. It was</p> <p>16 Sony Pictures. It was Sony Pictures, and it was</p> <p>17 for about three or four years extended, and then</p> <p>18 it kind of faded away.</p> <p>19 Q. So Sony purchased the rights under an</p> <p>20 option agreement whereby they had -- was it</p> <p>21 exclusive rights for a period of time if they</p> <p>22 wanted to --</p> <p>23 A. Yes, they had exclusive rights, and</p> <p>24 they have the right to extend, and they</p> <p>25 extended, and then the time has passed, and then</p>
<p style="text-align: right;">Page 91</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Do you know if Simon &amp; Schuster</p> <p>3 benefited by way of increased sales following</p> <p>4 March 2018 and the broadcasts at issue?</p> <p>5 A. I don't know.</p> <p>6 Q. But you personally, because the</p> <p>7 advance has not been recovered by the publisher,</p> <p>8 it sounds like your income was unaffected from</p> <p>9 zero to zero following March 2018 with respect</p> <p>10 to the book sales?</p> <p>11 A. That's correct.</p> <p>12 Q. With regard to the 11 boxes of</p> <p>13 documents that you sold to Columbia, did you</p> <p>14 have anyone -- did you have Randy or anyone at</p> <p>15 Randy's law firm review those documents before</p> <p>16 you sold them or, you know --</p> <p>17 A. No, no.</p> <p>18 Q. Are you kept apprised of how many</p> <p>19 copies of your book have been sold, you know,</p> <p>20 since its publication in 2007?</p> <p>21 A. I did, but I forgot really. It was</p> <p>22 in the -- it was issued in many languages, in</p> <p>23 many countries, so it was somewhere of the order</p> <p>24 of maybe 50 to 80,000 copies altogether.</p> <p>25 Q. Did you have an agency agreement with</p>	<p style="text-align: right;">Page 93</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 they essentially pulled the -- they developed it</p> <p>3 quite a lot, spent a lot of money, had script,</p> <p>4 had a director attached, tasked and so on, but</p> <p>5 then eventually they pulled the project, as we</p> <p>6 were told informally, because of the subject</p> <p>7 matter. To put it simply, they were afraid of</p> <p>8 Mr. Putin.</p> <p>9 Q. Was there a screenwriter attached?</p> <p>10 A. There were I think at least two.</p> <p>11 Q. Was there a script?</p> <p>12 A. There was a script, but I don't have</p> <p>13 it. They own it.</p> <p>14 Q. Did you consult on the script?</p> <p>15 A. There was a consulting agreement</p> <p>16 attached, option agreements which expired</p> <p>17 simultaneously. And I read the script, yes, and</p> <p>18 gave some comments. Not much.</p> <p>19 Q. Did you --</p> <p>20 A. And --</p> <p>21 Q. All right, go ahead.</p> <p>22 A. It was -- the consulting was part of</p> <p>23 the option amount. There was no extra money in</p> <p>24 that.</p> <p>25 Q. Did you maintain a copy of that</p>



<p style="text-align: right;">Page 94</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 script that you read?</p> <p>3 A. No, I don't think so that I have it.</p> <p>4 I don't remember really. I don't think I have</p> <p>5 it because they were very uptight about</p> <p>6 releasing it to everybody, so they might have</p> <p>7 asked to return it.</p> <p>8 Q. And what's your understanding of what</p> <p>9 phase the film was in? Was it in -- had it gone</p> <p>10 to shooting? Was it still in preproduction?</p> <p>11 What was the --</p> <p>12 A. It was in preproduction, as far as I</p> <p>13 understand the process. There was a director,</p> <p>14 there was a script, there was some casting,</p> <p>15 casting discussions. It was all 2009. There</p> <p>16 was a, you know, production company, outside</p> <p>17 production company, associated with the project.</p> <p>18 It was funded by the studio, but there was a</p> <p>19 production company, that means a producer, and</p> <p>20 they worked a lot. They spent quite a lot of</p> <p>21 money I guess on the script, and then they --</p> <p>22 and there was a director.</p> <p>23 Q. Who was the director that had been</p> <p>24 attached?</p> <p>25 A. Michael Mann, you know, the</p>	<p style="text-align: right;">Page 96</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 forget about it.</p> <p>3 Q. And that was approximately when?</p> <p>4 2009?</p> <p>5 A. I would say it was probably around</p> <p>6 2009.</p> <p>7 I should tell you for the sake of</p> <p>8 entertainment is that there was another project,</p> <p>9 based on another book, by Warner Brothers. It</p> <p>10 was based on a book written by the New York</p> <p>11 Times correspondent in London entitled -- the</p> <p>12 book title was "The Terminal Spy," and it was</p> <p>13 optioned to the Warner Brothers and it was the</p> <p>14 same story. They were two competing projects,</p> <p>15 and director, a famous director, attached and</p> <p>16 the cast and so on. Johnny Depp was involved.</p> <p>17 And in the end, Warner Brothers</p> <p>18 pulled -- at about the same time, they pulled</p> <p>19 the project. And the director, his name was</p> <p>20 Mike -- I forgot it. The "Harry Potter"</p> <p>21 director. Anyway, and he was on BBC and said</p> <p>22 that the project was pulled because people in</p> <p>23 Hollywood were so frightened to do a story on</p> <p>24 that, that they pulled the project. So it was</p> <p>25 not exclusively a Sony situation.</p>
<p style="text-align: right;">Page 95</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 "Collateral."</p> <p>3 Q. And the plug was pulled on the</p> <p>4 production because Sony Pictures was afraid of</p> <p>5 Vladimir Putin?</p> <p>6 A. Yes. That's what we were told, but I</p> <p>7 have no documents to that effect.</p> <p>8 Q. Who told you that?</p> <p>9 A. My agent, the one who died, who</p> <p>10 monitored that.</p> <p>11 Q. And what was the, you know, substance</p> <p>12 of that discussion other than, you know, what</p> <p>13 we've already said --</p> <p>14 A. The substance that when the story, as</p> <p>15 far as I understand, of the film being produced</p> <p>16 of the -- about the Litvinenko murder, which</p> <p>17 involved, if I remember correctly, Mr. Putin</p> <p>18 being named as the murderer, that Sony in the</p> <p>19 end was told when the story was leaked in</p> <p>20 Moscow, that they can forget about the Russian</p> <p>21 market, which amounts to probably tens of</p> <p>22 billions of dollars. I don't know how much is</p> <p>23 the Sony market in Russia, but it's substantive.</p> <p>24 I mean the parent corporation. So they got</p> <p>25 afraid, and the parent Sony told Sony Pictures</p>	<p style="text-align: right;">Page 97</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 MR. SELLIER: Alex, remember when I</p> <p>3 told you all you had to do was answer the</p> <p>4 questions?</p> <p>5 THE WITNESS: Yeah.</p> <p>6 MR. SELLIER: Entertainment value is</p> <p>7 not really what counsel is interested in,</p> <p>8 but there you go.</p> <p>9 THE WITNESS: Okay, sorry.</p> <p>10 (Off the record at 11:50 a.m.)</p> <p>11 (Back on the record at 11:50 a.m.)</p> <p>12 BY MR. WANGSGARD:</p> <p>13 Q. How long with extensions was the</p> <p>14 Sony, you know, option agreement? Seven years,</p> <p>15 ten years, nine years, four years?</p> <p>16 A. It was I think standard agreement;</p> <p>17 two years, with an option of extending it for</p> <p>18 another year. So it was three years, but then</p> <p>19 it kind of lagged on informally for a year or</p> <p>20 two.</p> <p>21 Q. But then the rights reverted to you,</p> <p>22 and you were able to resell them again for</p> <p>23 the --</p> <p>24 A. Yes. And then some years later, this</p> <p>25 British company came and got an option for very</p>



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<p>1 ALEXANDER GOLDFARB</p> <p>2 little money and they're still developing it.</p> <p>3 Q. And they still hold that option?</p> <p>4 A. Yeah.</p> <p>5 Q. Do you know how long that lasts?</p> <p>6 A. It will expire next year.</p> <p>7 Q. Will the rights revert to you and</p> <p>8 Marina at that time?</p> <p>9 A. Probably, yeah, exactly. No, that's</p> <p>10 what the contract says, but as I said, I don't</p> <p>11 see much value in those rights. I mean maybe</p> <p>12 for Marina, is her life rights, but not for me,</p> <p>13 because since then, there were probably half a</p> <p>14 dozen books on Litvinenko, and there are several</p> <p>15 film projects which are based on those other</p> <p>16 books. One is coming out this year in the UK.</p> <p>17 Another is being developed by HBO, but it has</p> <p>18 nothing to do with us.</p> <p>19 The only reason I'm saying it is</p> <p>20 that -- the reason is that because of all those</p> <p>21 other film projects, the value of our book,</p> <p>22 which, after all, was published a long time ago,</p> <p>23 has diminished dramatically.</p> <p>24 Q. And my understanding is that you are</p> <p>25 a widower. Is that correct?</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. And do you know where she lives?</p> <p>3 A. In California.</p> <p>4 Q. And without going into too much</p> <p>5 personal detail, can you just sort of tell me in</p> <p>6 a nutshell why the marriage resulted in divorce?</p> <p>7 A. The marriage resulted in divorce</p> <p>8 because I had to emigrate from Russia, otherwise</p> <p>9 I would highly likely end up in jail, and she</p> <p>10 didn't want to leave her parents, so we</p> <p>11 divorced.</p> <p>12 Q. And her parents were in Russia at the</p> <p>13 time or I guess USSR?</p> <p>14 A. Yes, USSR.</p> <p>15 Q. And so she stayed there for a period</p> <p>16 of time after --</p> <p>17 A. She stayed there for a period of</p> <p>18 time, and then eventually she ended up here with</p> <p>19 her second husband.</p> <p>20 Q. Do you know when she ended up here?</p> <p>21 And I assume "here" means the</p> <p>22 United States.</p> <p>23 A. Yes.</p> <p>24 When? After the end of the Soviet</p> <p>25 Union, so should be early '90s. Oh, yeah, early</p>
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<p>1 ALEXANDER GOLDFARB</p> <p>2 A. Yes.</p> <p>3 Q. And when did your wife die?</p> <p>4 A. My wife died 2010.</p> <p>5 Q. And what was her name?</p> <p>6 A. Her name was Svetlana,</p> <p>7 S-V-E-T-L-A-N-A.</p> <p>8 Q. Did you have a wife before Svetlana?</p> <p>9 A. Yes.</p> <p>10 Q. When were you first married to your</p> <p>11 first wife?</p> <p>12 A. My first wife, I was married back in</p> <p>13 Russia when I was 23, so it was long time ago.</p> <p>14 Q. And for how long were you married to</p> <p>15 your first wife?</p> <p>16 A. Probably five years or so.</p> <p>17 Q. Did that result in divorce or...</p> <p>18 A. Yes.</p> <p>19 Q. And do you recall when you were</p> <p>20 divorced?</p> <p>21 A. I was divorced before I left Russia,</p> <p>22 and it was 1973.</p> <p>23 Q. Do you know if your first wife is</p> <p>24 still living?</p> <p>25 A. Yes.</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 '90s, of course. '91 maybe.</p> <p>3 Q. So you divorced, and then you</p> <p>4 emigrated to the US. Is that --</p> <p>5 A. No, I emigrated to Israel.</p> <p>6 Q. Israel, Germany, we'll get into that.</p> <p>7 I'm sorry to jump ahead.</p> <p>8 Ultimately you --</p> <p>9 MR. SELLIER: Hold on just one</p> <p>10 second.</p> <p>11 Alex?</p> <p>12 THE WITNESS: Yes.</p> <p>13 MR. SELLIER: Please let Kendall</p> <p>14 finish his questions.</p> <p>15 THE WITNESS: Oh, yeah. Sorry.</p> <p>16 MR. SELLIER: You are jumping in</p> <p>17 before he's finished his question. You</p> <p>18 probably are right when you're guessing</p> <p>19 what the question's going to be, but you</p> <p>20 should wait.</p> <p>21 THE WITNESS: Yes.</p> <p>22 MR. SELLIER: Okay. And it will be</p> <p>23 easier for the court reporter.</p> <p>24 THE WITNESS: Sorry.</p> <p>25 MR. SELLIER: And the record will be</p>



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<p>1 ALEXANDER GOLDFARB</p> <p>2 clearer.</p> <p>3 THE WITNESS: Yes, sorry.</p> <p>4 MR. SELLIER: Okay, good.</p> <p>5 MR. WANGSGARD: So actually I mean</p> <p>6 it's probably a good time to take another</p> <p>7 five-minute break. Before we -- so let's</p> <p>8 do that. Go off the record and we can take</p> <p>9 a break.</p> <p>10 (Recess taken at 11:56 a.m.)</p> <p>11 (Back on the record at 12:06 p.m.)</p> <p>12 MR. WANGSGARD: We're back at 12:06</p> <p>13 on my watch.</p> <p>14 BY MR. WANGSGARD:</p> <p>15 Q. And I think we were talking a little</p> <p>16 bit about your marriage to your second wife,</p> <p>17 Svetlana, who died. When did she die?</p> <p>18 A. She died in 2010.</p> <p>19 Q. And how old was she when she died?</p> <p>20 A. She was born in '55, so she must have</p> <p>21 been, let me see. 45 and 10. 55.</p> <p>22 Q. She was born in 1955?</p> <p>23 A. Yeah.</p> <p>24 Q. And died in 2010?</p> <p>25 A. Yes.</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 A. Yes.</p> <p>3 Q. Who is your current wife?</p> <p>4 THE WITNESS: Randy, do I have to</p> <p>5 answer that?</p> <p>6 MR. SELLIER: Is there some</p> <p>7 conceivable relevance to this current --</p> <p>8 give him her first name.</p> <p>9 A. Her name is Tanya.</p> <p>10 BY MR. WANGSGARD:</p> <p>11 Q. So going to your second wife,</p> <p>12 Svetlana, when did you meet her?</p> <p>13 A. I met her in New York. When? Let me</p> <p>14 see. I met her the late '80s, it should be</p> <p>15 probably. Let me tell you exactly.</p> <p>16 Probably 1990, around that time.</p> <p>17 Q. 1990?</p> <p>18 A. Yes.</p> <p>19 Q. And how did you meet her?</p> <p>20 A. At a restaurant.</p> <p>21 Q. In the United States, in Russia,</p> <p>22 or --</p> <p>23 A. In New York.</p> <p>24 Q. Is she Russian or was she Russian?</p> <p>25 A. Yes.</p>
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<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. So she was 55?</p> <p>3 A. Yes.</p> <p>4 Q. Got it. Are you aware of news</p> <p>5 reports, including The Daily Beast and</p> <p>6 Courthouse News, that reported her being 51 when</p> <p>7 she died?</p> <p>8 A. No, I'm not aware of that.</p> <p>9 Q. Any idea why anyone would have that</p> <p>10 impression that she died at 51 and not 55?</p> <p>11 A. Well, if you go by what Walter</p> <p>12 Litvinenko said, she died in 2006, which would</p> <p>13 make it 51. But the reality is that she died in</p> <p>14 2010, which would make it 55. So in the</p> <p>15 confusion probably, that was the reason.</p> <p>16 Q. And what was the cause of her death?</p> <p>17 A. Cancer.</p> <p>18 Q. And was that in New York or</p> <p>19 elsewhere?</p> <p>20 A. It was in New York.</p> <p>21 Q. Have you been remarried since then?</p> <p>22 A. Yes.</p> <p>23 Q. You've been remarried since 2010?</p> <p>24 A. Yes.</p> <p>25 Q. Are you currently married?</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Did she speak Russian?</p> <p>3 A. Yes.</p> <p>4 Q. Was she fluent?</p> <p>5 A. Yes.</p> <p>6 Q. Do you know if she had a -- if she</p> <p>7 knew Alexander Litvinenko before?</p> <p>8 A. Yes.</p> <p>9 Q. How did she know Alexander</p> <p>10 Litvinenko?</p> <p>11 A. She went with me to Turkey in -- was</p> <p>12 it October, I guess, in October 2000, and</p> <p>13 actually we met them together, Marina and</p> <p>14 Alexander. That's how she met them.</p> <p>15 Q. Is it your understanding that that's</p> <p>16 the first time they met?</p> <p>17 A. Yes.</p> <p>18 Q. And when did you marry your current</p> <p>19 wife?</p> <p>20 A. Last year.</p> <p>21 Q. And how did you meet her?</p> <p>22 A. Some party in Manhattan.</p> <p>23 Q. Does she have a separate income from</p> <p>24 you? Does she work, I guess?</p> <p>25 A. Yes. She's self-employed.</p>



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<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. And what's she do for</p> <p>3 self-employment?</p> <p>4 A. She's a --</p> <p>5 THE WITNESS: Randy, may I ask a</p> <p>6 question?</p> <p>7 MR. SELLIER: Yeah, could -- we're</p> <p>8 getting a little far afield here, Kendall.</p> <p>9 I'm not sure it matters.</p> <p>10 But you can answer. Go ahead. We'll</p> <p>11 watch this.</p> <p>12 THE WITNESS: Ask my question to you,</p> <p>13 is it off the record?</p> <p>14 MR. SELLIER: No. Do you want to</p> <p>15 give me a call?</p> <p>16 THE WITNESS: Yes.</p> <p>17 MR. WANGSGARD: Let's go off the</p> <p>18 record.</p> <p>19 (Off the record at 12:12 p.m.)</p> <p>20 (Back on the record at 12:14 p.m.)</p> <p>21 MR. SELLIER: Okay.</p> <p>22 MR. WANGSGARD: So we're back on at</p> <p>23 about 12:14. Was there a question pending?</p> <p>24 MR. SELLIER: You wanted to know what</p> <p>25 his wife's --</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 sometime in 2019, '20, or '21?</p> <p>3 A. Yes, I would say so. I have to</p> <p>4 remember when we met, but it was a couple of</p> <p>5 years before we got married. And then sometime</p> <p>6 later, she met Marina when Marina visited, and</p> <p>7 she visited in 2018 when we filed the complaint.</p> <p>8 Q. Just to put a bookmark on it or an</p> <p>9 end mark on it, you met your wife after the</p> <p>10 complaint was filed. Is that correct?</p> <p>11 A. No, I met her shortly before, but she</p> <p>12 was not my wife at the time.</p> <p>13 Q. Got it. And you got married</p> <p>14 thereafter.</p> <p>15 A. I got married exactly one year ago.</p> <p>16 Q. And approximately what is her age,</p> <p>17 just...</p> <p>18 A. Her age is approximately</p> <p>19 50-something.</p> <p>20 Q. In her 50s?</p> <p>21 A. Yeah.</p> <p>22 Q. All right. I think I'll move on from</p> <p>23 there and focus a little bit more on your</p> <p>24 background.</p> <p>25 Were you born in approximately 1947?</p>
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<p>1 ALEXANDER GOLDFARB</p> <p>2 MR. WANGSGARD: Self-employment is.</p> <p>3 MR. SELLIER: -- self-employment is.</p> <p>4 Go ahead, he can answer that.</p> <p>5 A. Yeah, she's a music teacher.</p> <p>6 BY MR. WANGSGARD:</p> <p>7 Q. What's her approximate income yearly?</p> <p>8 A. \$20,000.</p> <p>9 Q. Have you ever met her -- or did you</p> <p>10 know her during the relevant period, so let's</p> <p>11 say up through March of 2018, or did you meet</p> <p>12 her after the events --</p> <p>13 A. No, I met her last year or a year</p> <p>14 before that.</p> <p>15 Q. Does she have any relation to -- does</p> <p>16 she have any relation to Marina Litvinenko,</p> <p>17 friends or otherwise?</p> <p>18 A. They know each other.</p> <p>19 Q. Did they meet through you?</p> <p>20 A. They met through me, yes.</p> <p>21 Q. Oh, this is March 2018?</p> <p>22 A. Maybe before that. I don't remember.</p> <p>23 No, but, no, of course, because it's</p> <p>24 when we met, so post 2018 clearly.</p> <p>25 Q. You met your current wife at a party</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 Is that correct?</p> <p>3 A. Yes, exactly.</p> <p>4 Q. Was that in Moscow?</p> <p>5 A. Yes.</p> <p>6 Q. Did you grow up in Moscow?</p> <p>7 A. Yes.</p> <p>8 Q. And did you attend school in Moscow?</p> <p>9 A. Yes.</p> <p>10 Q. Did you wind up going to university?</p> <p>11 A. Yes.</p> <p>12 Q. And where was that?</p> <p>13 A. It was Moscow State University.</p> <p>14 Q. And did you graduate from Moscow</p> <p>15 State University?</p> <p>16 A. Yes.</p> <p>17 Q. Approximately when?</p> <p>18 A. 1969.</p> <p>19 Q. And did you receive a bachelor's</p> <p>20 degree of some sort?</p> <p>21 A. It was master's degree in '69.</p> <p>22 Q. Did you receive a bachelor's before</p> <p>23 1969?</p> <p>24 A. Yeah. It was probably '67.</p> <p>25 Q. And was that a BA or a BS or...</p>



<p style="text-align: right;">Page 110</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. It's a different system, so there is</p> <p>3 no formal bachelor's degree. It goes straight</p> <p>4 to master's like the German system. It's not</p> <p>5 the British system.</p> <p>6 Q. So in 1969 you received a master's</p> <p>7 from Moscow State University.</p> <p>8 A. Yes.</p> <p>9 Q. And what was the subject of that</p> <p>10 degree?</p> <p>11 A. Biochemistry.</p> <p>12 Q. So tell me what -- you know, what</p> <p>13 does a degree in biochemistry entail?</p> <p>14 A. Degree in biochemistry entails</p> <p>15 research in basic fields of biology. It's in a</p> <p>16 basic field of biology.</p> <p>17 Q. So what type of classes do you take?</p> <p>18 What are the, you know, subjects you are</p> <p>19 studying?</p> <p>20 A. Biology, math, physics, chemistry,</p> <p>21 physiology, neurology and that sort of thing,</p> <p>22 but not in the medical sense, in the basic</p> <p>23 science sense.</p> <p>24 Q. So in the sense of the type of</p> <p>25 physics that you would study, what physics</p>	<p style="text-align: right;">Page 112</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Institute of Atomic Energy?</p> <p>3 A. Four years.</p> <p>4 Q. And what was your specific role</p> <p>5 there?</p> <p>6 A. I was a kind of graduate student</p> <p>7 there.</p> <p>8 Q. And what did that involve on sort of</p> <p>9 a day-to-day basis?</p> <p>10 A. It involved doing research in their</p> <p>11 biology division on my thesis, which had to do</p> <p>12 with basic issues of biochemistry, so I did lab</p> <p>13 experiments and getting guidance and advice from</p> <p>14 my supervisor. And eventually I was supposed to</p> <p>15 write a thesis, which I did not.</p> <p>16 Q. You ultimately did not write a thesis</p> <p>17 or did not write that thesis?</p> <p>18 A. I did not write the thesis, so I</p> <p>19 never finished my Ph.D. program there.</p> <p>20 Q. And what sort of nuclear-related work</p> <p>21 or research went into your activities there?</p> <p>22 A. Well, there was not much</p> <p>23 nuclear-related aspects of my research other</p> <p>24 than belonging to the lab, which was part of the</p> <p>25 huge atomic energy and bureaucracy. Our</p>
<p style="text-align: right;">Page 111</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 classes were you taking?</p> <p>3 A. I took a regular university class of</p> <p>4 physics.</p> <p>5 Q. Just one? Just like a --</p> <p>6 A. I don't remember at the moment.</p> <p>7 Q. Any nuclear-related studies as part</p> <p>8 of the biochemistry degree?</p> <p>9 A. Not at that time.</p> <p>10 Q. How about at a later time?</p> <p>11 A. I did my Ph.D. in a nuclear research</p> <p>12 center, although my specific subject had nothing</p> <p>13 to do with nuclear medicine.</p> <p>14 Q. We'll come back to that, but let's</p> <p>15 talk about what you did for employment after</p> <p>16 graduating with a master's in 1969.</p> <p>17 A. Well, I went to work as a junior</p> <p>18 scientist in the Soviet Institute of Atomic</p> <p>19 Energy, which is a national flagship lab in many</p> <p>20 fields of basic science, with a particular focus</p> <p>21 on atomic energy.</p> <p>22 Q. Did you start there immediately after</p> <p>23 graduation?</p> <p>24 A. Yes.</p> <p>25 Q. And how long were you employed at the</p>	<p style="text-align: right;">Page 113</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 division was a biology division, which did</p> <p>3 biological research to the same extent let's say</p> <p>4 that a biology lab in -- let's say in an</p> <p>5 American lab belonging to a national laboratory</p> <p>6 would do biological research.</p> <p>7 Q. Any work or research that touched on</p> <p>8 polonium-210?</p> <p>9 A. No.</p> <p>10 Q. Do you know what polonium-210 is?</p> <p>11 A. Now, yes.</p> <p>12 Q. When did you first learn what</p> <p>13 polonium-210 is?</p> <p>14 A. I first learned it on the -- the name</p> <p>15 essential- -- well, of course I knew the name</p> <p>16 from my basic chemistry course, but I first kind</p> <p>17 of focused on the specific substance on the day</p> <p>18 the British police told us that Litvinenko was</p> <p>19 poisoned with polonium-210, and it took me</p> <p>20 probably 20 minutes to figure out what it was on</p> <p>21 the internet.</p> <p>22 Q. When you were studying at the</p> <p>23 Institute of Atomic Energy, did any of the</p> <p>24 biology work that you were working on relate to</p> <p>25 absorption or other physiological effects of</p>



<p style="text-align: right;">Page 114</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 radioactive materials or radioactivity?</p> <p>3 A. None whatsoever.</p> <p>4 Q. Are others -- you know, I'm just</p> <p>5 trying to understand the connection between</p> <p>6 studying biology at an institute of something</p> <p>7 called the Institute of Atomic Energy.</p> <p>8 Was anyone else who was studying your</p> <p>9 subject, biology, focused on anything related to</p> <p>10 atomic energy, the intersection of atomic energy</p> <p>11 and biology?</p> <p>12 A. Not in our department, as far as I</p> <p>13 can tell. Our department was a pure -- how you</p> <p>14 call it? -- pure basic research which had no</p> <p>15 relation to applied aspects such as medicine,</p> <p>16 defense, economy, and so on.</p> <p>17 Q. Not in your department, but were</p> <p>18 there other departments then --</p> <p>19 A. The other departments were behind the</p> <p>20 wall, and we had no idea what's going there,</p> <p>21 what's going on there.</p> <p>22 Q. When you say the wall, is that a --</p> <p>23 A. The wall is the security screen</p> <p>24 between different departments. It was a --</p> <p>25 everything was -- in Russia was very secure.</p>	<p style="text-align: right;">Page 116</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 biochemistry of genetics processes.</p> <p>3 Q. Anything related to the effect of</p> <p>4 atomic energy on biological processes?</p> <p>5 A. No.</p> <p>6 Q. And the thesis that you were working</p> <p>7 on but you didn't finish there, what was the</p> <p>8 subject or...</p> <p>9 A. It was -- the subject was the</p> <p>10 mechanism of genetic transcription, which is an</p> <p>11 aspect of gene expression in bacteria.</p> <p>12 Q. Ultimately it sounds like you didn't</p> <p>13 complete your Ph.D. there, but you obviously</p> <p>14 have a Ph.D. Is that correct?</p> <p>15 A. Yes.</p> <p>16 Q. And you completed that somewhere else</p> <p>17 at some later time?</p> <p>18 A. Yes, in Israel.</p> <p>19 Q. And when was that?</p> <p>20 A. Let me see. 1980 or so. Maybe '79</p> <p>21 or '80.</p> <p>22 Q. Why was what you were working on in</p> <p>23 the USSR in the field of biology, why was that</p> <p>24 conducted at the Institute of Atomic Energy as</p> <p>25 opposed to elsewhere?</p>
<p style="text-align: right;">Page 115</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. And is that wall because those other</p> <p>3 departments related to, for example, security or</p> <p>4 defense or weapons?</p> <p>5 A. Yes, yes. That was the institute</p> <p>6 that was involved in creating Russian bomb in</p> <p>7 the '50s.</p> <p>8 Q. And after you graduated in 1969, how</p> <p>9 did you choose to go continue sort of your work</p> <p>10 and research at the institute?</p> <p>11 A. Well, it's a marketplace in a way.</p> <p>12 Fresh graduates are choosing their thesis</p> <p>13 advisors, and thesis advisors around town are</p> <p>14 choosing students to do graduate work. And it</p> <p>15 so happens that my thesis advisor chose me, and</p> <p>16 I started doing this thesis research in his</p> <p>17 laboratory which belonged to Atomic Energy</p> <p>18 Institute.</p> <p>19 Q. Who was your thesis advisor?</p> <p>20 A. His name was Professor Khesin,</p> <p>21 K-H-E-S-I-N, Roman Khesin. He is a famous</p> <p>22 Russian Soviet biologist.</p> <p>23 Q. And what was the name of his lab?</p> <p>24 A. It was -- I don't remember. It -- I</p> <p>25 don't remember. It was something to do with</p>	<p style="text-align: right;">Page 117</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. Because the Institute of Atomic</p> <p>3 Energy had the biology division, and they were</p> <p>4 involved in basic biological research.</p> <p>5 Institute of Atomic Energy is a huge institution</p> <p>6 employing probably a couple of thousands of</p> <p>7 scientists and comprised of probably a hundred</p> <p>8 labs in every field of basic science; chemistry,</p> <p>9 physics, nuclear physics, biology, biochemistry,</p> <p>10 and so on. And so that's how it was there; to</p> <p>11 the same extent that national labs of US Atomic</p> <p>12 Energy Commission have labs doing all kinds of</p> <p>13 science.</p> <p>14 Q. Does the name Andrei Sakharov, is</p> <p>15 that familiar to you?</p> <p>16 A. Yes.</p> <p>17 Q. Who is Mr. Sakharov? Which is, if</p> <p>18 I'm not mistaken, S-A-K-H-A-R-O-V.</p> <p>19 A. He is a famous physicist who is</p> <p>20 credited with the design of Russian hydrogen</p> <p>21 bomb, who later fell off with the Soviet</p> <p>22 government and became a prominent human rights</p> <p>23 activist and human rights defender and who</p> <p>24 eventually was awarded a Nobel Peace Prize for</p> <p>25 his human rights work.</p>



<p style="text-align: right;">Page 118</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. And when did you meet Mr. Sakharov?</p> <p>3 A. I met him in 1973 when I was no</p> <p>4 longer employed by the Atomic Institute.</p> <p>5 Q. Why did you ultimately leave</p> <p>6 employment at the Atomic Institute?</p> <p>7 A. I left the employment of the Atomic</p> <p>8 Institute at the request of my thesis advisor.</p> <p>9 It was early 1973, and he requested that I</p> <p>10 resign because I told him that I will be seeking</p> <p>11 immigration visa from the -- exit visa from the</p> <p>12 Soviet Union, which at the time was considered</p> <p>13 an ultimate declaration of disloyalty to the</p> <p>14 regime.</p> <p>15 So when I told my thesis advisor that</p> <p>16 this is what I was planning to do, he said</p> <p>17 "They'll fire you anyway, so why don't you</p> <p>18 resign, which will save me a lot of</p> <p>19 aggravation," and I did because I was on very</p> <p>20 good terms with the man.</p> <p>21 Q. When you received your degree in</p> <p>22 1969, was that spring of '69?</p> <p>23 A. I don't -- '69 from the Moscow</p> <p>24 University, my master's degree?</p> <p>25 Q. Yes.</p>	<p style="text-align: right;">Page 120</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 even were thinking about it, and being Jewish</p> <p>3 was one of those reasons.</p> <p>4 To seek an exit visa as a Jew, you</p> <p>5 would argue that you want to go to Israel as a</p> <p>6 Jew, so that was a big trend at the time in</p> <p>7 Russia. And there are many people -- relatively</p> <p>8 many people, thousands, who were leaving using</p> <p>9 that route, and I figured out that I want to get</p> <p>10 out of the Soviet Union for political reasons</p> <p>11 essentially.</p> <p>12 Q. And what were those political</p> <p>13 reasons?</p> <p>14 A. I disagreed with the Soviet basic</p> <p>15 tenets and communism and couldn't see myself</p> <p>16 making a career in the Soviet science and</p> <p>17 staying sane and in good conscience.</p> <p>18 Q. And when did you meet Mr. Sakharov?</p> <p>19 A. I met Mr. Sakharov a couple of months</p> <p>20 after I resigned from Kurchatov Institute in</p> <p>21 Moscow.</p> <p>22 Q. And how did that meeting come about?</p> <p>23 A. Mr. Sakharov was actually at the time</p> <p>24 involved in a big public, very public, conflict</p> <p>25 with the Soviet government, and he was arguing</p>
<p style="text-align: right;">Page 119</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. It was spring of 1969, yes.</p> <p>3 Q. And then you started at the Atomic</p> <p>4 Institute shortly thereafter?</p> <p>5 A. Actually I started even a little bit</p> <p>6 earlier as a student who was coming to the lab</p> <p>7 to work while I still was at the university.</p> <p>8 But, yeah, I would say a few months before that,</p> <p>9 before my graduation, I started working in</p> <p>10 Khesin's lab.</p> <p>11 Q. And then when in 1973 was it</p> <p>12 suggested to you that you submit your</p> <p>13 resignation?</p> <p>14 A. It was sometime in early spring,</p> <p>15 probably in April, that I came to him and said I</p> <p>16 had enough, "I will be seeking to emigrate."</p> <p>17 And he said, "You know what, why don't you do</p> <p>18 this favor to me and resign," and I said sure.</p> <p>19 Q. Why did you choose that time to seek</p> <p>20 your exit visa?</p> <p>21 A. Seeking an exit visa in the Soviet</p> <p>22 Union was a big issue because emigration was</p> <p>23 prohibited.</p> <p>24 Only certain categories of people</p> <p>25 were not only allowed to seek an exit visa but</p>	<p style="text-align: right;">Page 121</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 against many Soviet policies from, you know,</p> <p>3 nuclear tests to human rights.</p> <p>4 And he was actually well-known to</p> <p>5 everybody in town and around town because he was</p> <p>6 giving interviews to Western media, which came</p> <p>7 back to Moscow through Western broadcasts like</p> <p>8 the Voice of America, for example.</p> <p>9 And at the time -- and he didn't know</p> <p>10 English, by the way, didn't know English good</p> <p>11 enough and I knew English reasonably well. And</p> <p>12 somebody who was helping Mr. Sakharov</p> <p>13 communicate with the English speaking world,</p> <p>14 that is, foreign correspondents in Moscow,</p> <p>15 somebody who was actually acting as his</p> <p>16 interpreter suddenly got an exit visa and was</p> <p>17 leaving the country. So -- and I knew that</p> <p>18 person, and he said "Would you mind taking my</p> <p>19 place as Professor Sakharov's interpreter and</p> <p>20 translator," and I said yes.</p> <p>21 And this person brought me to</p> <p>22 Sakharov's apartment and that's how I met him.</p> <p>23 It was probably May or June 2073.</p> <p>24 Q. 1973?</p> <p>25 A. Yes.</p>



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<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. What was he doing, you know, for a</p> <p>3 living at the time?</p> <p>4 A. Who? Sakharov?</p> <p>5 Q. Yes.</p> <p>6 A. Well, he was top establishment, and</p> <p>7 he was getting whatever members of the</p> <p>8 academy -- he was a full member of the Russian</p> <p>9 Academy of Sciences, and they got -- were</p> <p>10 receiving allowance from the academy. I guess</p> <p>11 that was his main income. That's as far as I</p> <p>12 know.</p> <p>13 Q. Did you work with him on any of his</p> <p>14 scientific projects?</p> <p>15 A. No.</p> <p>16 Q. Did you work for him in any other</p> <p>17 capacity other than as a translator or</p> <p>18 interpreter?</p> <p>19 A. No.</p> <p>20 Q. Did you travel with him?</p> <p>21 A. No. He didn't travel and I didn't</p> <p>22 travel with him.</p> <p>23 Q. And when he was giving interviews to,</p> <p>24 you know, Western outlets or individuals, was</p> <p>25 that in Moscow or was that elsewhere?</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. And what level of tutoring?</p> <p>3 A. Mostly kids for their university</p> <p>4 entry exams. And I translated. And once I got</p> <p>5 \$500, which was a lot of money at the time, from</p> <p>6 a Moscow New York Times correspondent by the</p> <p>7 name of Hedrick Smith, who was writing a book</p> <p>8 about Russia, and I helped him find sources.</p> <p>9 Q. Did Mr. Sakharov face any sort of</p> <p>10 repercussions from within the USSR government</p> <p>11 for sort of the Western-related interviews or</p> <p>12 interactions he was having?</p> <p>13 A. Yes.</p> <p>14 Q. Can you describe those.</p> <p>15 A. Shortly after I left, I think it was</p> <p>16 the end of 1975, he was exiled to a provincial</p> <p>17 city of Gorky, which is at the time -- presently</p> <p>18 is Nizhny Novgorod, but at the time it was</p> <p>19 called Gorky, and he spent there five years</p> <p>20 essentially confined to his apartment, under</p> <p>21 virtual house arrest, where he could no longer</p> <p>22 meet any foreigner, and he -- his family was put</p> <p>23 under tremendous pressure.</p> <p>24 He held a hunger strike, he was</p> <p>25 force-fed, and in the end he was released by</p>
Page 123	Page 125
<p>1 ALEXANDER GOLDFARB</p> <p>2 A. It was in Moscow, mostly in his</p> <p>3 apartment.</p> <p>4 Actually my first meeting with him</p> <p>5 was to translate his interview, which I believe</p> <p>6 became a cover story in Newsweek, and ever</p> <p>7 since, I just met him socially mostly in his</p> <p>8 apartment and usually in the context of him</p> <p>9 communicating with foreign correspondents or</p> <p>10 visiting foreigners. For example, I think I</p> <p>11 brought a US senator to visit him in Moscow and</p> <p>12 it was '74.</p> <p>13 Q. Ultimately you received an exit visa.</p> <p>14 Is that correct?</p> <p>15 A. That is correct.</p> <p>16 Q. And when did that occur?</p> <p>17 A. It was spring 1975.</p> <p>18 Q. In between when you resigned in</p> <p>19 spring of '73 and spring of '75 when you</p> <p>20 received your exit visa, did you have any other</p> <p>21 employment besides working with Mr. Sakharov as</p> <p>22 an interpreter?</p> <p>23 A. I tutored privately.</p> <p>24 Q. In biology or some other subject?</p> <p>25 A. Biology.</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 Mikhail Gorbachev when the reform- -- Gorbachev</p> <p>3 reforms started, but for five years he was in</p> <p>4 bad shape.</p> <p>5 Q. Were you in contact with him during</p> <p>6 that five-year period of exile?</p> <p>7 A. No.</p> <p>8 Q. Did you reestablish contact with him</p> <p>9 at some point after he was released?</p> <p>10 A. Yes. When Gorbachev allowed him to</p> <p>11 come back to Moscow and Sakharov became sort of</p> <p>12 a national hero for a reform-minded Russian, I</p> <p>13 immediately established contact with him. And</p> <p>14 as an example, when he gave his first interview</p> <p>15 to American television over a satellite link, I</p> <p>16 was sitting in the studio of NBC News in</p> <p>17 New York translating.</p> <p>18 Q. What year was that?</p> <p>19 A. '80- -- let me see. It was probably</p> <p>20 '86.</p> <p>21 Q. Do you recall who the senator was</p> <p>22 that visited him in Moscow before, you know --</p> <p>23 A. Yes.</p> <p>24 Q. -- 1974?</p> <p>25 Who was that?</p>



<p style="text-align: right;">Page 126</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. James Buckley.</p> <p>3 Q. And how did that meeting come about?</p> <p>4 How was it arranged?</p> <p>5 A. Well, there was a sort of underground</p> <p>6 network of several hundred individuals who for</p> <p>7 one or other reasons had problems with the</p> <p>8 authorities. We were all closely watched by the</p> <p>9 KGB, of course.</p> <p>10 And when Buckley visited Moscow, I</p> <p>11 actually met him on the street. Somebody</p> <p>12 introduced me to him, and he said -- and I was</p> <p>13 introduced to him because it was known that I'm</p> <p>14 associated with Sakharov, and he said "I want to</p> <p>15 visit him," and I said sure. So I brought him</p> <p>16 to his apartment, to Sakharov's apartment.</p> <p>17 Q. Do you know what the purpose of his</p> <p>18 visit to the USSR was?</p> <p>19 A. Well, he was an influential senator</p> <p>20 in the United States, a very -- it was -- I</p> <p>21 don't remember. Was it -- it was Nixon</p> <p>22 administration, and he was a Republican and the</p> <p>23 whole issue of Soviet-American relations was</p> <p>24 very much on the agenda.</p> <p>25 And Nixon and Kissinger were pushing</p>	<p style="text-align: right;">Page 128</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. How long was it, if you recall? An</p> <p>3 hour, five hours?</p> <p>4 A. No, it was between one and two hours.</p> <p>5 Q. Was Mr. Sakharov ultimately awarded</p> <p>6 the Nobel Peace Prize?</p> <p>7 A. Yes.</p> <p>8 Q. And what's your understanding of what</p> <p>9 that was for?</p> <p>10 A. It was for his public activity on</p> <p>11 behalf of human rights and peace and fostering</p> <p>12 better understanding of -- between East and</p> <p>13 West, but I don't remember of course the exact</p> <p>14 wording.</p> <p>15 Q. It sounds like it took you</p> <p>16 approximately two years to obtain the exit visa.</p> <p>17 Is that correct?</p> <p>18 A. Yes. Yes.</p> <p>19 If I may, I should say that initially</p> <p>20 when I applied for exit visa, my application was</p> <p>21 turned down and I became what's known as a</p> <p>22 refusenik. That is a person whose exit</p> <p>23 application was refused, and it was in the fall</p> <p>24 of '73. So -- and then in the spring of '75, I</p> <p>25 was told that I can leave.</p>
<p style="text-align: right;">Page 127</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 for some sort of a rapport with the Soviet</p> <p>3 government, and there was opposition to that,</p> <p>4 mostly led by Senator Henry Jackson, a Democrat.</p> <p>5 And at the time there was legislation debated in</p> <p>6 the United States about blocking some economic</p> <p>7 benefits, trade benefits, to the Soviet</p> <p>8 government unless and until the Soviet</p> <p>9 government allows free emigration.</p> <p>10 This legislation later became known</p> <p>11 as Jackson Amendment to the trade bill, and</p> <p>12 Sakharov was the one who spoke strongly in favor</p> <p>13 of the Jackson Amendment, and essentially, in</p> <p>14 the larger sense, in favor of Western</p> <p>15 legislative sanctions against the Soviet Union</p> <p>16 on the subject of human rights.</p> <p>17 So this was the context of the</p> <p>18 Senator Buckley visit, and Sakharov forcefully</p> <p>19 explained to him why pressuring the Soviet</p> <p>20 government through economic sanctions is in the</p> <p>21 interests of the humanity at large, and I</p> <p>22 translated it.</p> <p>23 Q. Did that meeting occur at Sakharov's</p> <p>24 apartment?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 129</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Did you have to reapply after it</p> <p>3 was --</p> <p>4 A. No. I was called in to department of</p> <p>5 the Police Ministry, and they told me that "You</p> <p>6 better get out of here as soon as you can or</p> <p>7 else, so you have a visa." They gave me the</p> <p>8 visa.</p> <p>9 Q. What was your understanding of the</p> <p>10 basis for the initial refusal?</p> <p>11 A. The basis for initial refusal was a</p> <p>12 policy of refusing educated people from leaving</p> <p>13 the country in order to contain brain drain from</p> <p>14 the Soviet Union. Officially it was because</p> <p>15 it's not in the interests of Soviet -- it's not</p> <p>16 in the Soviet national interest, something to</p> <p>17 that effect.</p> <p>18 Q. Did you ever consider defecting or</p> <p>19 otherwise trying to leave the country without</p> <p>20 authorization?</p> <p>21 A. Well, no, because that would entail</p> <p>22 the risk of being shot at the border.</p> <p>23 Q. At that time in the USSR, was it</p> <p>24 necessary to get an exit visa even if it was for</p> <p>25 travel, to the extent you were allowed to travel</p>



<p style="text-align: right;">Page 130</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 outside of the --</p> <p>3 A. No. Nobody was getting a visa.</p> <p>4 There were no essentially private visas. There</p> <p>5 were probably for, you know, marriage purposes,</p> <p>6 but travel abroad was something which was</p> <p>7 reserved for the privilege elite, and in every</p> <p>8 case involved a loyalty check. My father</p> <p>9 traveled a lot when he was -- when I was a kid,</p> <p>10 but then everything stopped.</p> <p>11 Q. Were your parents still alive in</p> <p>12 1975?</p> <p>13 A. Yes.</p> <p>14 Q. Were they in Russia or the USSR?</p> <p>15 A. Yes, they stayed back.</p> <p>16 Q. Did you consult with them about your</p> <p>17 decision to emigrate?</p> <p>18 A. Yes.</p> <p>19 Q. And what was their take on that?</p> <p>20 A. Well, my father was the principal</p> <p>21 decision-maker in that respect, and he actually</p> <p>22 blessed it, blessed my decision, because he was</p> <p>23 of the same attitude towards the Soviet power.</p> <p>24 And he was actually happy that I left because he</p> <p>25 felt, and he said this explicitly, that if I</p>	<p style="text-align: right;">Page 132</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 back to Russia was in 1987, I think, or '86. I</p> <p>3 don't remember exactly. It was '86 or '87. I</p> <p>4 have to double-check if you're interested.</p> <p>5 Yes, when Gorbachev untightened the</p> <p>6 screws and proclaimed his policies of openness</p> <p>7 and restructuring, they allowed me to visit</p> <p>8 Moscow. I was not a Russian -- Soviet citizen</p> <p>9 any longer, and I went there, yes, with the</p> <p>10 assignment actually from The New York Times</p> <p>11 Magazine to write about my experiences back in</p> <p>12 Moscow.</p> <p>13 MR. SELLIER: Hang on a second, maybe</p> <p>14 I misheard -- misunderstood the question.</p> <p>15 Was the question the last time he was in</p> <p>16 Russia?</p> <p>17 BY MR. WANGSGARD:</p> <p>18 Q. What was the most recent time you've</p> <p>19 been in Russia?</p> <p>20 A. Oh, I'm sorry, I thought it was the</p> <p>21 first time. So the first time was in '86. The</p> <p>22 last time I was in Russia was in I think</p> <p>23 September or October 2000.</p> <p>24 Q. Have you sought to go back since fall</p> <p>25 of 2000?</p>
<p style="text-align: right;">Page 131</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 don't get out, I'll end up in jail.</p> <p>3 Q. Is that because of political</p> <p>4 activities you were engaged in?</p> <p>5 A. Yes, because of Sakharov and similar</p> <p>6 things like passing. I was involved in, you</p> <p>7 know, the pipeline of getting information of</p> <p>8 human rights abuses in the -- in and outside the</p> <p>9 gulag to the foreign correspondents in Moscow,</p> <p>10 which will then be publicized in the West.</p> <p>11 Q. Were you engaged in those activities</p> <p>12 prior to first applying for an exit visa?</p> <p>13 A. At about the same time. I applied</p> <p>14 for a visa and went headlong into these</p> <p>15 activities because my calculation essentially</p> <p>16 was that I have to bring myself to the level</p> <p>17 where they would have no choice, to jail me or</p> <p>18 to kick me out.</p> <p>19 Q. After an initial refusal, obviously</p> <p>20 your exit visa was granted in 1975 and you then</p> <p>21 left the USSR. Is that correct?</p> <p>22 A. Yes.</p> <p>23 Q. When's the last time you were back to</p> <p>24 Russia or what is now Russia?</p> <p>25 A. The first time, the first time I went</p>	<p style="text-align: right;">Page 133</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. Since I was there in 2000, I was --</p> <p>3 well, it's hard to explain that I sought it. I</p> <p>4 was invited to visit Russia I think in 2013.</p> <p>5 After Mr. Berezovsky died, I was invited to come</p> <p>6 to Russia by a TV program, Russian TV program.</p> <p>7 I think it was Channel One or one other major</p> <p>8 network, but -- and they tried to arrange a visa</p> <p>9 for me to visit Russia, but they couldn't, so I</p> <p>10 didn't go.</p> <p>11 Q. I'll touch on that a little bit</p> <p>12 later.</p> <p>13 Where did you go immediately upon</p> <p>14 exiting the USSR on your immigration visa?</p> <p>15 A. In '75, I went to Israel via Vienna.</p> <p>16 Q. Do you recall giving an interview</p> <p>17 with the Harvard newspaper, the Harvard Crimson,</p> <p>18 in approximately 1975?</p> <p>19 A. Very possibly.</p> <p>20 Q. Do you know if in that -- or do you</p> <p>21 recall if in that interview you told the Harvard</p> <p>22 Crimson that you left the USSR because you</p> <p>23 possessed secret military and warfare</p> <p>24 information?</p> <p>25 A. I left -- sorry, what did I say?</p>



<p style="text-align: right;">Page 134</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Do you recall if you told the Harvard</p> <p>3 Crimson that you left -- one of the reasons why</p> <p>4 you left the USSR was because you possessed</p> <p>5 secret military and warfare information</p> <p>6 important to the security of the Soviet state?</p> <p>7 A. I don't remember it, and I should say</p> <p>8 that I couldn't have said this to Harvard</p> <p>9 Crimson or anybody else because I never</p> <p>10 possessed secret information or military</p> <p>11 information. If you could give me an exact</p> <p>12 quote or show me that article.</p> <p>13 Q. We might do that, but we'll move on.</p> <p>14 Do you recall telling that</p> <p>15 publication that your work in Moscow involved,</p> <p>16 quote, physiological biochemistry?</p> <p>17 A. I could have told that. It's not an</p> <p>18 exact rendition, but, yeah, that's what I was</p> <p>19 doing.</p> <p>20 Q. And what -- how do you define</p> <p>21 physiological biochemistry of that --</p> <p>22 A. It's a basic -- well, if I said this,</p> <p>23 I definitely didn't mean that it has anything to</p> <p>24 do with human -- or animal, for that matter --</p> <p>25 physiology. That means the functioning of the</p>	<p style="text-align: right;">Page 136</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. You know, before the break, we had</p> <p>3 discussed a Harvard Crimson article that I'd</p> <p>4 like to show you, so I will share my screen.</p> <p>5 And so hopefully up is -- it's a</p> <p>6 little difficult to read, so let me know if you</p> <p>7 can see that, Dr. Goldfarb?</p> <p>8 A. Yes, I can see that.</p> <p>9 MR. WANGSGARD: This is a five-page</p> <p>10 document that I guess I'll put in as</p> <p>11 Exhibit B just for clarity.</p> <p>12 (DEPOSITION EXHIBIT B MARKED</p> <p>13 FOR IDENTIFICATION at 1:49 p.m.)</p> <p>14 BY MR. WANGSGARD:</p> <p>15 Q. Sorry, it's a one-page document with</p> <p>16 four pages of advertisements that are not</p> <p>17 relevant, so I'll focus on just Page 1.</p> <p>18 Do you recognize this article?</p> <p>19 A. Vaguely.</p> <p>20 Q. Do you remember -- does this refresh</p> <p>21 your recollection as to whether or not you spoke</p> <p>22 with Harvard Crimson in approximately middle of</p> <p>23 1975?</p> <p>24 A. I don't remember, but I could have.</p> <p>25 Could very well have.</p>
<p style="text-align: right;">Page 135</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 human or animal organism.</p> <p>3 My subject was study of basic</p> <p>4 biochemical processes in bacterium, so -- but</p> <p>5 there is a physiology of bacterium. So with</p> <p>6 that caveat, that probably is a correct</p> <p>7 description of what I was doing.</p> <p>8 Q. Did any of that involve the study of</p> <p>9 how a living organism breaks down chemical</p> <p>10 substances such as radiation?</p> <p>11 A. Well, radiation is not a substance,</p> <p>12 and my research had nothing to do with that sort</p> <p>13 of thing. My research, as I already mentioned,</p> <p>14 had to do with how genes of a living organism,</p> <p>15 specifically bacteria, are expressed to provide</p> <p>16 for the functioning of that organism.</p> <p>17 MR. WANGSGARD: This is probably a</p> <p>18 good time for a lunch break if everyone's</p> <p>19 on board with that.</p> <p>20 MR. SELLIER: Okay.</p> <p>21 (Lunch recess taken at 1:06 p.m.)</p> <p>22 (Back on the record at 1:48 p.m.)</p> <p>23 MR. WANGSGARD: All right, so we're</p> <p>24 back on at about 1:48.</p> <p>25 BY MR. WANGSGARD:</p>	<p style="text-align: right;">Page 137</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. And the title of this article is</p> <p>3 "Soviet Dissident Credits Westerners for His</p> <p>4 Emigration."</p> <p>5 Do you recall this article coming out</p> <p>6 around that time?</p> <p>7 A. I don't remember, but it probably did</p> <p>8 come out about that time.</p> <p>9 Q. I'm going to focus on a couple</p> <p>10 passages here, but if you would like to review</p> <p>11 the whole document, let me know and you're</p> <p>12 entitled to do that.</p> <p>13 A. Sure.</p> <p>14 Q. Do you know if you're the Alexander</p> <p>15 Goldfarb referenced here as a Jewish molecular</p> <p>16 biologist who recently emigrated from the Soviet</p> <p>17 Union to Israel?</p> <p>18 A. Yes.</p> <p>19 Q. Do you remember being in the</p> <p>20 Cambridge, presumably Massachusetts, area in</p> <p>21 1975 on or near the Harvard campus?</p> <p>22 A. Yes.</p> <p>23 Q. Do you remember what's referenced</p> <p>24 here in Paragraph 2, an informal discussion that</p> <p>25 you gave at MIT?</p>

35 (Pages 134 to 137)



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<p>1 ALEXANDER GOLDFARB</p> <p>2 A. Yes.</p> <p>3 Q. So this article under the heading in</p> <p>4 bold "Military Info," and I'll read it. It says</p> <p>5 that:</p> <p>6 "Goldfarb said he was initially</p> <p>7 refused permission to emigrate on the</p> <p>8 grounds that he possessed secret military</p> <p>9 and warfare information important to the</p> <p>10 security of the Soviet state."</p> <p>11 Do you remember telling anyone</p> <p>12 associated with Harvard that you possessed such</p> <p>13 information?</p> <p>14 A. No, I never said that I possessed</p> <p>15 such information. I said that I was refused</p> <p>16 permission on the grounds that I possessed this</p> <p>17 information, which I really did not. So what I</p> <p>18 said, it was the reason for refusing me</p> <p>19 permission, and the reason was wrong</p> <p>20 essentially.</p> <p>21 Q. So was it that the article</p> <p>22 inaccurately portrayed something you had said to</p> <p>23 the interviewer? Is that --</p> <p>24 A. No. The article is portraying</p> <p>25 everything very accurately. The article says</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. But you did not -- your testimony is</p> <p>3 that you did not in fact have state secrets?</p> <p>4 A. My testimony is that -- my testimony</p> <p>5 is that I didn't have any state secrets in my</p> <p>6 possession, and my testimony is that the article</p> <p>7 that you're showing me never says that I stated</p> <p>8 otherwise, that I had these secrets.</p> <p>9 Q. Right, but the article is correct in</p> <p>10 stating that you -- it's correct in relaying</p> <p>11 that you stated that it was stated to you that</p> <p>12 that was the basis for your denial whether or</p> <p>13 not --</p> <p>14 A. Yes.</p> <p>15 Q. Got it. Okay. That's all I have on</p> <p>16 Exhibit B.</p> <p>17 At any point did the Soviet</p> <p>18 government cite your work at the Institute of</p> <p>19 Atomic Energy as a basis for denying your exit</p> <p>20 visa?</p> <p>21 A. Yes.</p> <p>22 Q. And what was the substance of that</p> <p>23 discussion or --</p> <p>24 A. The substance of that discussion was</p> <p>25 that "You are being denied exit visa because we</p>
Page 139	Page 141
<p>1 ALEXANDER GOLDFARB</p> <p>2 that I was initially refused permission to</p> <p>3 emigrate on the grounds that I possessed</p> <p>4 information, but I never said that I possessed</p> <p>5 information. I actually denied that I possessed</p> <p>6 any information in the next paragraph.</p> <p>7 Q. So focusing on the first paragraph,</p> <p>8 is that a reason that the Soviet government gave</p> <p>9 to you --</p> <p>10 A. That is right. This is --</p> <p>11 Q. -- (indiscernible) --</p> <p>12 (Indiscernible crosstalk.)</p> <p>13 (Reporter clarification.)</p> <p>14 MR. SELLIER: Alex, remember the</p> <p>15 rule? Let Kendall finish.</p> <p>16 A. Yes, Kendall, go ahead. Sorry.</p> <p>17 BY MR. WANGSGARD:</p> <p>18 Q. So was the reason you were given by</p> <p>19 the Soviet government when you were denied your</p> <p>20 exit visa in 1973, did they give as a reason --</p> <p>21 and "they" being the government or government</p> <p>22 agents of the USSR -- tell you that the basis</p> <p>23 for your denial was because you had state</p> <p>24 secrets?</p> <p>25 A. That is correct.</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 believe that your work in the lab constitutes</p> <p>3 military -- not military -- "constitutes</p> <p>4 information important for the national</p> <p>5 security."</p> <p>6 And I might add that this is not</p> <p>7 true.</p> <p>8 Q. It's your assessment that none of the</p> <p>9 work you were doing while studying in Moscow had</p> <p>10 any bearing on Soviet security or defense?</p> <p>11 A. It is indeed my assessment, which is</p> <p>12 corroborated by some evidence which I can cite.</p> <p>13 Q. And just so we're clear, none of that</p> <p>14 work involved polonium-210.</p> <p>15 A. None of this involved polonium-210 or</p> <p>16 anything else related to nuclear matters.</p> <p>17 Q. After your exit visa was initially</p> <p>18 denied, it was later granted in 1975?</p> <p>19 A. Yes.</p> <p>20 Q. And if I've got it correct, earlier</p> <p>21 you were told in sum and substance to pack up</p> <p>22 and get out. Is that a fair assessment?</p> <p>23 A. Yes.</p> <p>24 Q. How quickly after you were told that</p> <p>25 did you physically leave the USSR?</p>



<p style="text-align: right;">Page 142</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. Within a month approximately.</p> <p>3 Q. When did you and your first wife</p> <p>4 determine to divorce because you were seeking to</p> <p>5 emigrate? Was that when you first applied for</p> <p>6 the exit visa or when it was granted or</p> <p>7 somewhere in between?</p> <p>8 A. It was before I first applied. That</p> <p>9 is sometime early in '73.</p> <p>10 Q. Was that finalized by 1975 when you</p> <p>11 left?</p> <p>12 A. No, it was finalized in 1973 before I</p> <p>13 applied.</p> <p>14 Q. So when you say finalized, the</p> <p>15 divorce decree had actually been granted</p> <p>16 in 1973.</p> <p>17 A. Yes.</p> <p>18 Q. Where did you go immediately upon</p> <p>19 emigrating out of the USSR?</p> <p>20 A. To Israel.</p> <p>21 Q. And how long were you in Israel?</p> <p>22 A. Approximately five years.</p> <p>23 Q. Were you living in -- where were you</p> <p>24 living?</p> <p>25 A. I was living in the town called</p>	<p style="text-align: right;">Page 144</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 disclosing state secret if these documents</p> <p>3 contain any state secret. Otherwise, I would</p> <p>4 consider reasons for denying me exit visa false.</p> <p>5 And this was covered by a specific article in</p> <p>6 the New York Times at the time.</p> <p>7 Q. How did you select Israel as the</p> <p>8 place to which you would emigrate?</p> <p>9 A. Because the exit visa specify that</p> <p>10 I'm being allowed to leave to Israel.</p> <p>11 And I should add that when I left, I</p> <p>12 was forced to renounce my Soviet citizenship, so</p> <p>13 this piece of paper that they gave me said</p> <p>14 "Destination Israel" and I couldn't go anywhere</p> <p>15 else.</p> <p>16 Q. I think you previously testified</p> <p>17 there was approximately a two-year period</p> <p>18 between first applying for the exit visa and it</p> <p>19 being granted. Is that correct?</p> <p>20 A. Correct.</p> <p>21 Q. And that shortly after or around the</p> <p>22 time that you first applied in 1973, you</p> <p>23 resigned your position?</p> <p>24 A. I resigned my position sometime</p> <p>25 before I applied.</p>
<p style="text-align: right;">Page 143</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Rehovot, R-E-H-O-V-O-T.</p> <p>3 Q. Besides, you know, personal</p> <p>4 possessions, did you take anything with you when</p> <p>5 you emigrated?</p> <p>6 A. I did send out something which is not</p> <p>7 my personal possessions, so to say, but I did</p> <p>8 take it out with me.</p> <p>9 Q. What was it that you sent?</p> <p>10 A. It was the comprehensive records and</p> <p>11 notes of my research at the Atomic Institute.</p> <p>12 Q. Did the institute know you were</p> <p>13 taking the notes and records?</p> <p>14 A. I don't know about whether the</p> <p>15 institute knew, but it was reported in the</p> <p>16 New York Times.</p> <p>17 And actually I notified that I am</p> <p>18 taking out -- I'm sending out my records several</p> <p>19 government agencies, including the KGB, the</p> <p>20 Ministry of Police, which was in charge of the</p> <p>21 exit visa, and the Soviet Academy of Sciences.</p> <p>22 So I sent them certified letters</p> <p>23 notifying them that I'm sending these documents</p> <p>24 out by mail and with other means, and</p> <p>25 essentially challenge you to arrest me for</p>	<p style="text-align: right;">Page 145</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Before applying, as a favor to</p> <p>3 Professor Khesin?</p> <p>4 A. Yes.</p> <p>5 Q. When did you send the notes and</p> <p>6 collected materials out of the country?</p> <p>7 A. It was sometime in '74, probably six</p> <p>8 months before I received exit visa or so, which</p> <p>9 can be very easily confirmed by the date line of</p> <p>10 the article in the New York Times.</p> <p>11 Q. And when did you send the certified</p> <p>12 letters to the various government agencies</p> <p>13 advising them that you were going to or that you</p> <p>14 had sent these documents out?</p> <p>15 A. Say it again?</p> <p>16 Q. The first question is, did the letter</p> <p>17 advise them that you were planning to send the</p> <p>18 documents out of the country or that you had</p> <p>19 already sent the documents out of the country?</p> <p>20 A. The notification said that I already</p> <p>21 have sent it out.</p> <p>22 Q. The notification was that you had</p> <p>23 already sent the documents out.</p> <p>24 A. That's correct.</p> <p>25 Q. Where did you send them to?</p>



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A. I send them to the Weizmann Institute in Israel, I send them to a colleague at MIT in Boston, and that's all I remember at the moment. Maybe somewhere else.

Q. At the time you sent them, your visa was currently in the denied status. Is that correct?

A. That is correct. That was kind of a ploy to force their hand to either getting me a visa or putting me on trial for treason or something like that.

Q. What, you know, in general terms or as specific as you can be if there's -- do you recall what was in the notes? Like what...

A. In the notes were my lab journal where I recorded for almost a year my experiments, the way they were developing, some notes, some conclusions, some thoughts. What is normally called in research science lab journal.

Q. You know, what's the quantity? How much -- how many pages approximately?

A. Well, it's probably -- it's kind of a notebook. Probably less than a hundred pages, more than 50 pages.

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Q. Is that the totality of what you sent or is that just the lab book?

A. That's the totality of my lab book. That's what I essentially sent.

Q. Was there anything outside of the lab notebook that you sent?

A. No.

Q. And how did you elect MIT and the Weizmann Institute as the places you would send --

A. Well, the Weizmann Institute was the -- I'll call it the top science institution in Israel, where I ended up working later. And MIT was simply because I had a colleague there so I could put a name on the address.

Q. Do you recall the name of that colleague?

A. I think it was Professor Jonathan King, K-I-N-G.

Q. And were you working with colleagues at either MIT or Weizmann, or were you on this research? Why would they be interested, I guess?

A. No, I was not working with them, but

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their work were in the same field. Jon King's was in the same field, and I knew him personally from his visit to Moscow earlier on, and that's what I did.

Q. And what was the nature of the experiments that you were doing as part of your studies that would have been reflected in these lab journals?

A. The nature of those experiments was -- as I said, was studying the biochemical mechanism of gene expression in a particular harmless bacterium which pertained to the basic scientific -- the basic biochemical problems at that time.

Q. After you arrived in Israel and for the five years approximately that you were there, did you maintain contact with your ex-wife at all?

A. No.

Q. How about your parents back in the USSR?

A. Oh, yes.

Oh, sorry. I did maintain contact with my ex-wife indirectly through my parents

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because I had a child left in Russia at the time by my ex-wife, and I was sending, you know, money, clothing and that sort of thing through my parents to her.

Q. Was it just the one child with your first wife?

A. Yes.

Q. Did you have any children with your second wife?

A. No.

Q. Do you have any other children or just the one?

A. By second wife, you mean Svetlana?

Q. Yes.

A. No, I had no children with Svetlana, but I have a child before Svetlana.

Q. Separate from your first wife?

A. Yes, separate from my first wife and separate from my second wife.

Separate from Svetlana. I had a wife in between.

Q. Is your current wife your fourth wife? I just want to make sure I'm clear on --

A. Yeah.

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Q. Okay. What were the dates of your marriage to your second wife?

A. Let me see. It was approximately from '82 -- or '80- -- no, no, no, no, wait a minute. Let me collect my thoughts.

So it's from '86 approximately to '91 or '90. '86, '90.

Q. And you had a child during that time?

A. Yes.

Q. Do you have any other children other than the two?

A. No, no. These two.

Q. And why did that second marriage end in approximately 1991?

A. It was a consensual divorce because we kind of drifted apart.

Q. And remind me when you married Svetlana.

A. When I married Svetlana, it was about the time -- so it should be '82 or '83. I need to refresh my memory. If you want exact dates, I will send it later.

Q. Is that when you first met her?

A. Yes.

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Q. And when did you marry her?

A. I married her -- well, let me see.

No, that's not when I met her. I met her in the '90- -- I'm sorry, I mixed up the dates. I met her and married her shortly afterwards. It was early '90s, so it should be probably '92.

Q. Were you involved with Svetlana romantically while still married to your second wife?

A. Yes, legally.

Q. So legally married.

A. Legally married, yes, but we separated and then I got involved with Svetlana.

Q. Was your second wife aware of your involvement with Svetlana before the divorce was finalized?

A. Sure.

Q. Besides --

MR. SELLIER: Kendall, hold on a second. I haven't objected. It seems very far afield to the subject matter of the case, but, you know, I'm just reserving my rights, but go ahead.

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MR. WANGSGARD: I'd move on, but I'm just getting the biography straight in my head sort of chronologically who the contacts are, where are the contacts, the nationality of the contacts, and when.

BY MR. WANGSGARD:

Q. But my next question would be besides your parents and your ex-wife, who is still in the USSR, at least indirectly, who else did you maintain contact with in the USSR while you were in Israel?

A. Many people. Essentially all or some, most of the prominent public activists in the dissident movement, including -- let's see. Do you need the names?

Q. If you recall them.

A. I don't recall them all, but, well, I can name Anatoly Sharansky, who took over from me as Sakharov's interpreter and as a spokesman for the dissident community until he was arrested and sent to jail. I maintained contact with Yuri Orlov, a prominent dissident, until he was arrested and sent to jail. It was all in the late '70s. And I maintained contact with

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several of Western, mostly American, correspondents in Moscow.

Q. And what was the nature of your -- of the contact that you maintained with people still in the USSR, besides personal with your parents or your ex-wife and child?

A. Yeah. Well, the nature was that primarily through the correspondents, I communicated with my family, with my parents, because American correspondents in Moscow at the time had access to the US diplomatic pouch, and through this channel we were able to communicate bypassing Soviet censorship, which opened practically every mail, piece of mail, from the outside.

Also I corresponded with the dissidents regarding the ongoing political developments in the dissident movement.

Q. And when you use the term "dissident," I'm just curious what your understanding of that term means.

A. This is kind of an established term in the history of the late Soviet Union. It is a generic term describing individuals who

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publicly protested against the Soviet abuses in the field of human rights in various ways, from passing information abroad to the West, to staging demonstrations, through observing political trials, through reporting abuses and torture that the Soviet government subjected all kinds of people.

Q. Earlier you testified, you used the term "refusenik," which my understanding is that that is a term for people who are denied exit visas and perhaps has particular application to Jewish immigrants. Is that correct?

A. Correct.

Q. Did you when you arrived in Israel associate with other, you know, emigrants, with an E, that had left the USSR to Israel?

A. Yes, I did.

Q. And what was the nature of those relationships?

A. Well, it was mostly social.

I should clarify that once I came to Israel, I went back to my science, so I essentially didn't spend much time on political anti-Soviet activism. So substantively that was

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Institute under a specific department?

A. Yes, it was department of biochemistry.

Q. Where would I go to find a copy of your thesis?

A. Good question. I certainly don't have it. It should probably be in the files of the Weizmann Institute if they keep those records.

Q. And you were in Israel for approximately five years?

A. Yes.

Q. Were you at the Weizmann Institute the entire time?

A. Yes.

Q. At some point you left Israel. Did you go to Germany? Is that correct?

A. That is correct.

Q. How long after obtaining your Ph.D. did you go to Germany?

A. Right away, actually, even couple of months before I got my Ph.D. by mail from Israel to Germany.

Q. I guess we should say West Germany at

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not my major effort.

Q. Did you obtain your Ph.D. while in Israel or complete your Ph.D.?

A. Yes.

Q. And what is your Ph.D. in, degree?

A. Ph.D. is in biochemistry. I got it in 1980 or '79. I don't remember correctly.

Q. And what was your dissertation in?

A. It was -- well, if I give you the name, it would be too technical, but it is the same the general area; gene expression, basic aspects of gene -- genetic expression in bacteria and bacterial viruses.

Q. Did you have a thesis advisor at the Weizmann Institute?

A. Oh, yes.

Q. And who was that?

A. Professor Violette -- a woman, Violette Daniel.

Q. And what was Professor Violette's field?

A. Genetic expression in bacteria and bacterial viruses.

Q. And was your work at the Weizmann

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this time for clarification.

A. Yes.

Q. While you were at the Weizmann Institute, did you maintain contact with Jonathan King at MIT?

A. No, no.

Q. Did you reestablish contact with him at any point after sending him your lab journals?

A. Yes. I met him a couple of times when I was already in New York briefly, but I would say that my journals were of no interest to him. I never asked him whether he received them.

Q. Do you know if any of his work touched on nuclear energy, atomic energy, or nuclear weapons?

A. Not that I know of.

Q. Do you know if his political activity touched on --

A. Oh, yes. He was a very prominent activist in the movement against biological weapons in the United States.

Q. Biological or nuclear?

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<p style="text-align: right;">Page 158</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. Biological. Had nothing to do with</p> <p>3 nuclear. Germ warfare, so he was campaigning</p> <p>4 against American germ warfare programs.</p> <p>5 Q. While at the Weizmann Institute --</p> <p>6 (Brief outside interruption.)</p> <p>7 Q. -- did any of your coursework or</p> <p>8 studies relate to nuclear physics?</p> <p>9 A. No.</p> <p>10 Q. Did any of your coursework or studies</p> <p>11 relate to radiation?</p> <p>12 A. No.</p> <p>13 Q. While at the Weizmann Institute, did</p> <p>14 you have any access to nuclear materials?</p> <p>15 A. Using radioactive isotopes is a</p> <p>16 normal part of any modern biological research,</p> <p>17 so in that sense, I did have access to research</p> <p>18 materials which are based on radioactive</p> <p>19 isotopes.</p> <p>20 Q. In what way is the use of radioactive</p> <p>21 isotopes a normal part of any modern study of</p> <p>22 microbiology? To put it more succinctly, how</p> <p>23 are they used?</p> <p>24 A. Well, they're used as molecular</p> <p>25 tracers of particular components of the cell to</p>	<p style="text-align: right;">Page 160</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 at the time of the -- Litvinenko's death.</p> <p>3 Q. After you left Israel and went to</p> <p>4 West Germany, where did you go?</p> <p>5 A. What did I do?</p> <p>6 Q. Where did you go? Where in Germany?</p> <p>7 A. I went to Munich. I went to Munich</p> <p>8 and joined the organization called Max Planck</p> <p>9 Institute for Biochemistry in Munich to do what</p> <p>10 is called postdoctoral studies.</p> <p>11 Q. And what does the Max Planck</p> <p>12 Institute do?</p> <p>13 A. Max Planck Institute is part of the</p> <p>14 Max Planck Society, which is the national</p> <p>15 network of government institutes in Germany</p> <p>16 dedicated to basic research. So Max Planck</p> <p>17 Institute for Biochemistry in Munich was doing</p> <p>18 research in biochemistry, all kinds of research.</p> <p>19 Q. Any research related to nuclear</p> <p>20 physics?</p> <p>21 A. No.</p> <p>22 Q. Any research related to radiation and</p> <p>23 its effect on the biology of cells or organisms?</p> <p>24 A. No.</p> <p>25 Q. Either by you or just at the</p>
<p style="text-align: right;">Page 159</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 see how substances are made in the cell, such as</p> <p>3 DNA or RNA and so on.</p> <p>4 Q. Are any polonium isotopes used in</p> <p>5 that research?</p> <p>6 A. No.</p> <p>7 Q. Was polonium-210 used in any of that</p> <p>8 research?</p> <p>9 A. No.</p> <p>10 Q. Did the Weizmann Institute have</p> <p>11 access to polonium-210?</p> <p>12 A. I don't know. Not in my work or in</p> <p>13 the department of biochemistry.</p> <p>14 Q. Were you aware of any -- even if it</p> <p>15 predated your time, any leaks of polonium-210</p> <p>16 from the Weizmann Institute?</p> <p>17 A. I learned about it later on during</p> <p>18 the Litvinenko case.</p> <p>19 Q. What did you learn later on during</p> <p>20 the Litvinenko case?</p> <p>21 A. I learned that at some point before I</p> <p>22 arrived at the Weizmann Institute, there was an</p> <p>23 accident with polonium-210 in the department of</p> <p>24 nuclear physics, and some people got hurt, but</p> <p>25 this I learned from the press, from the media,</p>	<p style="text-align: right;">Page 161</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 institute at the time, I guess would be --</p> <p>3 A. I don't know what was going on in the</p> <p>4 institute. As I said, there is a use of</p> <p>5 radioactive tracers in any modern biochemical</p> <p>6 experiment basically. So to that extent, there</p> <p>7 was isotopes there, but nothing to do with their</p> <p>8 effect on living organisms or nuclear aspects of</p> <p>9 that, certainly not polonium.</p> <p>10 Q. Do you know if the institute had</p> <p>11 access to polonium-210?</p> <p>12 A. Say it again?</p> <p>13 Q. Do you know if the institute had</p> <p>14 access to polonium-210?</p> <p>15 A. I don't know. I don't think so.</p> <p>16 Q. How long were you doing your</p> <p>17 postdoctoral studies at the institute?</p> <p>18 A. Two years.</p> <p>19 Q. Was that towards a specific degree or</p> <p>20 licensure of any sort, or just additional --</p> <p>21 A. No. It was just research, you know,</p> <p>22 which is part of any standard research career</p> <p>23 postdoctoral fellowship.</p> <p>24 Q. Was there a specific additional</p> <p>25 thesis or other project that you were working on</p>



<p style="text-align: right;">Page 162</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 for your postdoctoral studies?</p> <p>3 A. No. There were several publications,</p> <p>4 of course, both I should say in Moscow, from</p> <p>5 Moscow and from Israel and then from Germany,</p> <p>6 which were published in peer-reviewed scientific</p> <p>7 journals, so there were several from Germany.</p> <p>8 Q. Why did you ultimately leave Germany?</p> <p>9 A. Because my work there was never</p> <p>10 permanent or tenured. It was the understanding</p> <p>11 that I come for a -- it's like -- you know, it's</p> <p>12 like a fellowship in medicine; you come for a</p> <p>13 certain period of time, usually two to three</p> <p>14 years, publish some papers, and then you look</p> <p>15 for a permanent faculty position elsewhere.</p> <p>16 Q. During the time that you were in</p> <p>17 Israel and then the time that you were in</p> <p>18 Germany, what was your citizenship? Which is to</p> <p>19 say, were you a citizen of either Israel or</p> <p>20 Germany in a formal sense?</p> <p>21 A. Israel all the time. I got my</p> <p>22 Israeli citizenship upon arrival in '75 and I</p> <p>23 still have it.</p> <p>24 Q. Are you a dual Israeli-US citizen?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 164</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 financial support or other sponsorship when you</p> <p>3 came from West Germany to New York?</p> <p>4 A. No.</p> <p>5 Q. When did you start at Columbia?</p> <p>6 A. I think it was '82 or about.</p> <p>7 Q. When's the last time you prepared a</p> <p>8 resumé or updated a resumé?</p> <p>9 A. My resumé last time was updated -- I</p> <p>10 mean my research resumé was updated probably</p> <p>11 around 2002, maybe 2001, when I last applied for</p> <p>12 a research grant in the US.</p> <p>13 Q. Do you still have a copy of that?</p> <p>14 A. Sure.</p> <p>15 Q. What was your title when you started</p> <p>16 at Columbia?</p> <p>17 A. Assistant professor of microbiology.</p> <p>18 Q. Was that a tenure track position?</p> <p>19 A. Yes, it was a tenure track position.</p> <p>20 Q. Did you receive any promotions while</p> <p>21 at Columbia to -- for example, to associate</p> <p>22 professor?</p> <p>23 A. No.</p> <p>24 Q. Did you ever apply for tenure?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 163</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. When you left Germany, you came to</p> <p>3 New York. Is that correct?</p> <p>4 A. That is correct. I got a position at</p> <p>5 Columbia and went to New York.</p> <p>6 Q. And how did it come about that you</p> <p>7 got a position at Columbia? Was that something</p> <p>8 you applied for or did they recruit you?</p> <p>9 A. They advertised the position, I</p> <p>10 applied. They called me in for an interview. I</p> <p>11 flew to New York, had an interview, and then</p> <p>12 they made me an offer.</p> <p>13 Q. And when you left the Soviet Union</p> <p>14 and went to Israel, did anyone support you</p> <p>15 financially that enabled you to emigrate?</p> <p>16 A. No.</p> <p>17 Q. Did you pay for it yourself with --</p> <p>18 A. Yes.</p> <p>19 Q. And then did you receive any</p> <p>20 financial support when you left Israel and went</p> <p>21 to Germany?</p> <p>22 A. I had a fellowship. It's called Max</p> <p>23 Planck Fellowship or Max Planck Postdoctoral</p> <p>24 Fellowship.</p> <p>25 Q. And did you receive any sort of</p>	<p style="text-align: right;">Page 165</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Why not?</p> <p>3 A. Come to think of it, I did come up</p> <p>4 for tenure. I'm not sure I formally applied,</p> <p>5 but I didn't get it.</p> <p>6 Q. Do you know why you didn't get it?</p> <p>7 A. Oh, you should ask them. I think my</p> <p>8 department chairman didn't like me too much</p> <p>9 because of my political activities.</p> <p>10 Q. Do you know who your department</p> <p>11 chairman was at the time?</p> <p>12 A. At the time, his name was Professor</p> <p>13 Saul Silverstein.</p> <p>14 Q. Did you have any discussions with</p> <p>15 Mr. Silverstein about your political positions</p> <p>16 or activities?</p> <p>17 A. Yeah. He once told me "You spend too</p> <p>18 much in politics instead of science and we don't</p> <p>19 feel you're a good department citizen,"</p> <p>20 something to that effect.</p> <p>21 Q. And approximately when was that</p> <p>22 discussion where you were labeled --</p> <p>23 A. Let me see. It was sometime in late</p> <p>24 '80s. So I probably spent there about six</p> <p>25 years, so it should be '86 or so.</p>



<p style="text-align: right;">Page 166</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Or wait a minute. '86 or '87</p> <p>3 essentially.</p> <p>4 Q. After that discussion, did you</p> <p>5 ultimately leave the employment of Columbia</p> <p>6 University?</p> <p>7 A. Yeah. I applied for faculty at</p> <p>8 various institutions and universities, and I got</p> <p>9 an offer from institute called Public Health</p> <p>10 Research Institute in the city of New York.</p> <p>11 Q. And did you ultimately take that job?</p> <p>12 A. Yes.</p> <p>13 Q. When?</p> <p>14 A. Should be around '86, '87.</p> <p>15 Q. What did that job entail?</p> <p>16 A. The same thing that -- at Columbia.</p> <p>17 I had my own lab. I had research projects which</p> <p>18 were funded by federal grants such as the NIH,</p> <p>19 and sometimes by private -- NIH or National</p> <p>20 Science Foundation, and also by private grants</p> <p>21 such as American Cancer Society. And I had a</p> <p>22 research group of probably four to six people,</p> <p>23 you know, technicians, students, and so on.</p> <p>24 This is what is called in the trade</p> <p>25 principal investigator. I was a PI.</p>	<p style="text-align: right;">Page 168</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 of getting a visa. And I kept going there many</p> <p>3 times until October 2000 as a -- to visit family</p> <p>4 and, you know, see colleagues.</p> <p>5 And later on, I got involved with --</p> <p>6 probably around 1990 or 1991, about that time --</p> <p>7 with Mr. George Soros, the philanthropist, and I</p> <p>8 became his advisor, and I ran several programs</p> <p>9 funded by the Soros Foundation as an outside</p> <p>10 kind of advisor in Russia and the former Soviet</p> <p>11 Union.</p> <p>12 Q. Was the subject of your first visit</p> <p>13 back to the USSR in 1987, did that become the</p> <p>14 subject of an article that you wrote for The</p> <p>15 New York Times Magazine?</p> <p>16 A. Yes, correct. Well, it was also</p> <p>17 personal to visit my family. My sister was</p> <p>18 still in Moscow and my daughter was still in</p> <p>19 Moscow, but apart from that, I had an assignment</p> <p>20 from The Times Magazine.</p> <p>21 Q. Were you paid by The Times Magazine</p> <p>22 for that assignment?</p> <p>23 A. Yes.</p> <p>24 Q. And whose idea was that assignment?</p> <p>25 Did you go to The Times or did The Times come to</p>
<p style="text-align: right;">Page 167</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. And what was the subject matter of</p> <p>3 the work?</p> <p>4 A. Well, broadly speaking, the same;</p> <p>5 molecular mechanisms of genetic expression in</p> <p>6 bacteria.</p> <p>7 I would say you can add the -- a</p> <p>8 particular enzyme that we were studying actually</p> <p>9 for all those years. It's called RNA</p> <p>10 polymerase. This is the cellular enzyme which</p> <p>11 makes RNA in the cells.</p> <p>12 Q. And how long did that employment</p> <p>13 last?</p> <p>14 A. Well, I resigned sometime in late</p> <p>15 2006, after Litvinenko's death.</p> <p>16 Q. So you were employed by the Public</p> <p>17 Health Research Institute for approximately</p> <p>18 19 years. Is that right?</p> <p>19 A. About so, yeah.</p> <p>20 Q. Did you return to Russia between 1987</p> <p>21 and 1991 at any point?</p> <p>22 A. Yes. I returned to Russia for the</p> <p>23 first time in 1987 -- I think I mentioned that</p> <p>24 before -- as soon as it was possible for the</p> <p>25 folks like myself to return there in the sense</p>	<p style="text-align: right;">Page 169</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 you? Let me put it that way.</p> <p>3 A. I think I approached the editors of</p> <p>4 The Times Magazine and said that I got a visa to</p> <p>5 Russia.</p> <p>6 I was quite well-known character in</p> <p>7 the Russian -- widely known in their circles, as</p> <p>8 they say, and said that "I'm going to Russia, do</p> <p>9 you want me to write something about it, the</p> <p>10 return." So the subtitle of this article was</p> <p>11 "An Exile Visits His Homeland."</p> <p>12 Q. Was that published around</p> <p>13 December 6th, 1987, to the best of your</p> <p>14 recollection?</p> <p>15 A. Yes.</p> <p>16 Q. Was that edited by anyone?</p> <p>17 A. It was edited. Not substantially,</p> <p>18 but with regard to, you know, language, grammar,</p> <p>19 hopefully not spelling, by the staff editor at</p> <p>20 the magazine.</p> <p>21 Q. Was it an accurate portrayal by you?</p> <p>22 A. What was the accurate portrayal?</p> <p>23 Q. Do you believe that when you wrote</p> <p>24 the article, that the content that you put into</p> <p>25 it was accurate?</p>



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<p>1 ALEXANDER GOLDFARB</p> <p>2 A. Yes, I do.</p> <p>3 Q. Do you stand by that article today</p> <p>4 and the statements made in it?</p> <p>5 A. Yes, in the current context of the</p> <p>6 time.</p> <p>7 Q. In the article, you wrote that while</p> <p>8 you enjoyed the benefits of freedom, the</p> <p>9 irrational guilt of having left friends behind</p> <p>10 is always in the back of your mind, spoiling</p> <p>11 your best moments.</p> <p>12 What do you mean by the irrational</p> <p>13 guilt of having left friends behind?</p> <p>14 A. Well, like anybody who spent time</p> <p>15 let's say incarcerated or imprisoned and who</p> <p>16 gets out, I would say that irrational guilt</p> <p>17 towards those who are left behind is always part</p> <p>18 of the psyche, in that sense.</p> <p>19 Q. Why did you leave the Public Health</p> <p>20 Research Institute in 2006 around the time of</p> <p>21 the whole Litvinenko affair?</p> <p>22 A. Well, I thought that the time come to</p> <p>23 change my vocation and work full-time towards --</p> <p>24 in -- you know, in political area trying to get</p> <p>25 justice for Litvinenko's death, for Marina and</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 my father and my mother leaving the Soviet</p> <p>3 Union -- I think it was '86 actually, I don't</p> <p>4 remember exactly -- '86 my father and my mother</p> <p>5 arrived to New York from the Soviet Union, which</p> <p>6 was a big front page story all over the place.</p> <p>7 And Soros heard about it, and he sought me</p> <p>8 out -- or he sought my father out, and then</p> <p>9 through him, he met me.</p> <p>10 And then sometime later, I asked him</p> <p>11 for money to support two graduate students from</p> <p>12 Russia, and he gave me money, and that's how the</p> <p>13 relationship developed.</p> <p>14 And then sometime a couple of years</p> <p>15 later, that should be 1989 or 1990, he made me</p> <p>16 an offer to run a major program for him in</p> <p>17 Russia, and I did that without resigning from</p> <p>18 the Public Health Research Institute. So I did</p> <p>19 it for several years in parallel; for all of the</p> <p>20 '90s, to tell you the truth.</p> <p>21 Q. And how frequently were you in Russia</p> <p>22 during that period?</p> <p>23 A. At least every month or more, so I</p> <p>24 spent probably between one-third and one-half of</p> <p>25 my time in Russia, but I never lived there. I</p>
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<p>1 ALEXANDER GOLDFARB</p> <p>2 her son. That's number one.</p> <p>3 Number two, at the time, I was less</p> <p>4 dependent on the university salary because of</p> <p>5 the book contract and because, by then, I was</p> <p>6 already running Mr. Berezovsky's foundation, the</p> <p>7 IFCL, which brought an income comparable to the</p> <p>8 university salary, so I was not that -- so I</p> <p>9 kind of fell out of science and fully drifted</p> <p>10 into politics.</p> <p>11 Q. Did they ask you to leave based on</p> <p>12 your public persona and statements?</p> <p>13 A. No, no. I was fine there. I still</p> <p>14 had my funding, my federal grants. And I</p> <p>15 actually transferred the grants and the lab</p> <p>16 directorship to an associate of mine, and that</p> <p>17 was in -- you know, I just said that I don't</p> <p>18 want to do it any longer, enough is enough.</p> <p>19 Q. You mentioned a little bit your</p> <p>20 acquaintanceship with George Soros.</p> <p>21 A. Yes.</p> <p>22 Q. Can you tell me how that came about?</p> <p>23 A. Yes.</p> <p>24 Q. How did that come about?</p> <p>25 A. Well, in 1987, I -- in the context of</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 would come in for a week or two and then leave.</p> <p>3 This is between 1991 and 2000 when I worked for</p> <p>4 Soros.</p> <p>5 Q. Have you been back to Russia since</p> <p>6 2000?</p> <p>7 A. No.</p> <p>8 Q. Other than what you spoke about</p> <p>9 earlier, being invited to take part in a</p> <p>10 television program in Russia, have you sought to</p> <p>11 return since 2000?</p> <p>12 A. No.</p> <p>13 Q. When you last left in 2000, were you</p> <p>14 told that you were not permitted to return?</p> <p>15 A. No, with the caveat that it was my</p> <p>16 understanding. Let me see.</p> <p>17 At one point I talked to a friend who</p> <p>18 runs a travel -- I don't remember her name --</p> <p>19 who runs a travel agency in New York, and she</p> <p>20 asked a consul of the Russian Consulate in</p> <p>21 New York whether I had any chance of getting a</p> <p>22 visa, and the reply was "If he pays enough, we</p> <p>23 would give him a visa, but we would not advise</p> <p>24 him to go there." Informally.</p> <p>25 MR. WANGSGARD: I'm going to share on</p>



<p style="text-align: right;">Page 174</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 my screen and mark as Exhibit C a ten-page</p> <p>3 document titled "Affidavit of Plaintiff</p> <p>4 Alex Goldfarb in Opposition to Motion to</p> <p>5 Dismiss of Channel One Russia."</p> <p>6 (DEPOSITION EXHIBIT C MARKED</p> <p>7 FOR IDENTIFICATION at 2:52 p.m.)</p> <p>8 BY MR. WANGSGARD:</p> <p>9 Q. Do you recognize this document?</p> <p>10 A. Yes.</p> <p>11 Q. And it's Document 63, e-filed in</p> <p>12 Case 18-cv-8128, which is this action, correct?</p> <p>13 A. Yes.</p> <p>14 Q. Did you draft this document?</p> <p>15 A. Yes.</p> <p>16 Q. Would you like to review it before I</p> <p>17 focus on specific portions? Because you're</p> <p>18 certainly entitled to.</p> <p>19 A. No.</p> <p>20 Q. So I'll direct your attention to</p> <p>21 Paragraph 3, and your first sentence is:</p> <p>22 "As a threshold matter, it is</p> <p>23 unlikely that I would be able to obtain a</p> <p>24 Russian visa to attend hearings in Moscow."</p> <p>25 Is that your current belief?</p>	<p style="text-align: right;">Page 176</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 me visa support because in the first call they</p> <p>3 said "Don't apply for visa, we will let you know</p> <p>4 at what time you have to come to the consulate</p> <p>5 and collect your visa, which we will sponsor or</p> <p>6 support," the TV channel.</p> <p>7 So sometime later, she called me and</p> <p>8 said "We cannot get you visa support." I said</p> <p>9 "You see? I told you they wouldn't give me a</p> <p>10 visa." And the producer said "Wait, wait, wait</p> <p>11 a minute. We are a major media in Russia and</p> <p>12 who they think they are in the foreign ministry</p> <p>13 to deny our invitation. We will raise it at a</p> <p>14 higher level."</p> <p>15 Then a few days later, she called me</p> <p>16 and said that "Guess what, our invitation was --</p> <p>17 or our attempt to get you a visa was denied by</p> <p>18 the foreign ministry at an executive level in</p> <p>19 categorical terms, so you are essentially</p> <p>20 persona non grata." And that's it.</p> <p>21 So I never went -- or I never got a</p> <p>22 visa, not to mention, and that I never went. As</p> <p>23 I mentioned, for me, it was both a test to see</p> <p>24 if I get a visa and possibly decide to go there</p> <p>25 or not depending on the circumstances.</p>
<p style="text-align: right;">Page 175</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. Yes.</p> <p>3 Q. And what's the basis that you think</p> <p>4 it would be unlikely that you would be able to</p> <p>5 obtain a visa?</p> <p>6 A. Well, the story is that in June 2013,</p> <p>7 I got a phone call from a producer of TV</p> <p>8 Russia 1 -- it is not Channel One, it's a rival,</p> <p>9 second most important TV channel in Russia --</p> <p>10 inviting me to take part in a talk show, live</p> <p>11 talk show, in relation to the death of</p> <p>12 Mr. Berezovsky, which occurred a couple of</p> <p>13 months before that. And I told her, the</p> <p>14 producer, whose name I don't remember, that,</p> <p>15 yeah, why shouldn't we try.</p> <p>16 Part of the reasons why I agreed was</p> <p>17 to -- well, I should say that many people whom I</p> <p>18 talked about at the time told me don't go there,</p> <p>19 it's dangerous, and I -- my response was "Let's</p> <p>20 see if they give me a visa" and then I would</p> <p>21 worry whether I go or not. So I never was</p> <p>22 explicitly committed to this trip, but anyway I</p> <p>23 told them yes.</p> <p>24 Some days later, as they say, they</p> <p>25 informed me that they have a problem of getting</p>	<p style="text-align: right;">Page 177</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. So was that -- I guess, first of all,</p> <p>3 so you never actually applied for a visa?</p> <p>4 A. I never formally applied for a visa.</p> <p>5 I was told that Russia 1 applied to the foreign</p> <p>6 ministry to get me a visa, which I would then</p> <p>7 collect at the consulate.</p> <p>8 Q. And then how does the conversation</p> <p>9 you had with the TV Russia 1 producer relate to</p> <p>10 the conversation you had with your friend who</p> <p>11 was a travel agent?</p> <p>12 A. Oh, it was several years later. I</p> <p>13 asked about a visa to my travel agent probably</p> <p>14 even before Litvinenko died, probably 2005 or</p> <p>15 2004. It was just a social conversation, but it</p> <p>16 was "If you wish an attempt to get a visa."</p> <p>17 Informal.</p> <p>18 Q. So between your last trip to Russia</p> <p>19 in 2000 and the present, on at least two</p> <p>20 occasions you had discussions about whether or</p> <p>21 not you could return?</p> <p>22 A. I would say first occasion, I tested</p> <p>23 the waters and never applied because I was told</p> <p>24 there's no point. And my purpose at the time</p> <p>25 was not that much to get a visa, but to see if</p>



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<p>1 ALEXANDER GOLDFARB</p> <p>2 I'm on the blacklist.</p> <p>3 And in 2013, it was a more concerted</p> <p>4 effort by a powerful institution in Moscow to</p> <p>5 get me a visa, but from my standpoint, it was</p> <p>6 also a way to test my standing with the powers</p> <p>7 that be in Moscow.</p> <p>8 Q. Did you say test to see if you were</p> <p>9 on a blacklist?</p> <p>10 A. Yes.</p> <p>11 Q. Can you detail that for me? What</p> <p>12 were you testing exactly?</p> <p>13 A. People who are denied visas -- and</p> <p>14 there's several -- are referred to as people</p> <p>15 being blacklisted. So I have a couple of</p> <p>16 friends who are blacklisted, so from that I</p> <p>17 figured out that I'm one of them.</p> <p>18 Q. You believe that you're currently</p> <p>19 blacklisted from Russia?</p> <p>20 A. Well, I believe that if I for some</p> <p>21 reason get a visa currently, it would be not a</p> <p>22 visa but a ploy to get me in and harm me in some</p> <p>23 way, either by putting Novichok in my food or,</p> <p>24 you know, arresting me and putting me in jail.</p> <p>25 So now my relationships with Russia are much</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. And the response you received was</p> <p>3 there's very little chance other than if you</p> <p>4 paid enough money that you would get a visa?</p> <p>5 A. Yes.</p> <p>6 Q. And that you would have safety -- or</p> <p>7 you took -- you drew the conclusion that you</p> <p>8 would have physical safety concerns if you went</p> <p>9 over?</p> <p>10 A. You can put it that way, yes.</p> <p>11 Q. Do you know if you were blacklisted</p> <p>12 in 2000 after you last left?</p> <p>13 A. Well, in 2000, I helped Litvinenko to</p> <p>14 defect to UK and it was public, so at the time I</p> <p>15 wouldn't even think of going to Russia.</p> <p>16 Q. Would that apply for the year of 2001</p> <p>17 as well?</p> <p>18 A. Yeah, probably until 2003. I --</p> <p>19 well, I would put it that way. I never was</p> <p>20 eager to go to Russia starting with 2000, and</p> <p>21 the two instances where I was in contact</p> <p>22 indirectly with the Russian Consulate regarding</p> <p>23 a visa, it was more to assess the attitude of</p> <p>24 the powers that be in Moscow to my persona than</p> <p>25 to actually secure a way of getting into Moscow.</p>
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<p>1 ALEXANDER GOLDFARB</p> <p>2 more I would say -- after the Litvinenko</p> <p>3 inquiry, actually, I would say that it's beyond</p> <p>4 visa issue. I am worried about traveling not</p> <p>5 only to Russia, but to Europe and stay alive.</p> <p>6 Q. What was going to be the purpose of</p> <p>7 the 2004 slash 2005, whenever it was, trip that</p> <p>8 you were -- first tested the waters regarding</p> <p>9 why you were going to go over?</p> <p>10 A. It was not an explicit idea to go on</p> <p>11 a trip to Russia. It was the purpose to see if</p> <p>12 I am blacklisted or not.</p> <p>13 Q. And did you come to the conclusion at</p> <p>14 that time that you were blacklisted?</p> <p>15 A. As the -- no, I didn't get any</p> <p>16 conclusion other than friendly advice from a</p> <p>17 friendly consul to a friend of mine saying "You</p> <p>18 can get anything if you pay enough, but if I</p> <p>19 were him, I wouldn't go there," something to</p> <p>20 that effect. It was not about visa. It's about</p> <p>21 physical safety.</p> <p>22 Q. And a moment ago it sounded like you</p> <p>23 said you were testing to see whether you were</p> <p>24 blacklisted at that time. Is that --</p> <p>25 A. Yes.</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Draw your attention to Paragraph 4.</p> <p>3 You say that:</p> <p>4 "Even if I am allowed to enter,</p> <p>5 there's a considerable risk that I would be</p> <p>6 arrested as a suspect in the murder of</p> <p>7 Alexander Litvinenko."</p> <p>8 Is that your belief currently?</p> <p>9 A. Yes.</p> <p>10 Q. And then the next sentence:</p> <p>11 "Based on official statements from</p> <p>12 the Russian Prosecutor General Office, or</p> <p>13 PGO, Russian investigators give credence to</p> <p>14 the theory that Mr. Berezovsky and I killed</p> <p>15 Mr. Litvinenko."</p> <p>16 Is that your current belief?</p> <p>17 A. Yes.</p> <p>18 Q. Why in here in Paragraph 4 do you</p> <p>19 describe this as "the theory that I and</p> <p>20 Mr. Berezovsky killed Mr. Litvinenko."</p> <p>21 A. I think I elaborate that in the</p> <p>22 following paragraph, Paragraph 5.</p> <p>23 Q. And Paragraph 5 highlights some</p> <p>24 relevant PGO statements? Is that --</p> <p>25 A. Yes. PGO is the Russian prosecutor</p>



<p style="text-align: right;">Page 182</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 service.</p> <p>3 Q. So is it your statement here in</p> <p>4 Paragraph 4, as supported by Paragraph 5, that</p> <p>5 the version of events that Walter Litvinenko</p> <p>6 stated on, you know, Channel One Broadcast</p> <p>7 Number 1 in the complaint is the official</p> <p>8 government position of the government of Russia?</p> <p>9 A. I would say it's the official</p> <p>10 position of investigators in the prosecutor's</p> <p>11 office, which ostensibly is different from the</p> <p>12 position of the Russian government.</p> <p>13 Q. So the prosecutors and the</p> <p>14 investigators in Russia have adopted the version</p> <p>15 of events that Walter provided on the</p> <p>16 Channel One programs?</p> <p>17 A. From what I can read from the</p> <p>18 prosecution statement is that they</p> <p>19 investigating -- or they were investigating that</p> <p>20 theory, and in that context, they asked the</p> <p>21 British to question me as a possible accomplice.</p> <p>22 But I emphasize that this is the investigation</p> <p>23 rather than the government position.</p> <p>24 MR. WANGSGARD: I guess it's been</p> <p>25 about another hour, so why don't we take a</p>	<p style="text-align: right;">Page 184</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Was it funded by Mr. Berezovsky?</p> <p>3 A. Yes.</p> <p>4 Q. Solely, or was there other sources of</p> <p>5 funding?</p> <p>6 A. Solely, with the exception of one</p> <p>7 transfer back in 2000 from a different Russian</p> <p>8 oligarch whose name I don't remember really. Or</p> <p>9 maybe it was -- I would remember, yes, if I</p> <p>10 focus, whom Berezovsky asked to send the money</p> <p>11 essentially.</p> <p>12 Q. Did you receive a salary from the</p> <p>13 IFCL while you were its --</p> <p>14 A. Yes.</p> <p>15 Q. For all the years in which you had</p> <p>16 that role?</p> <p>17 A. Yes.</p> <p>18 Q. And how much was your salary?</p> <p>19 A. Well, it was roughly quote my</p> <p>20 university salary. I would say about hundred</p> <p>21 thousand a year or so, give or take in different</p> <p>22 years.</p> <p>23 Q. Did the IFCL provide any funding to</p> <p>24 you or your co-author Marina Litvinenko for the</p> <p>25 "Death of a Dissident" book?</p>
<p style="text-align: right;">Page 183</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 break for everyone to stretch.</p> <p>3 (Recess taken at 3:06 p.m.)</p> <p>4 (Back on the record at 3:13 p.m.)</p> <p>5 MR. WANGSGARD: So let's pick back</p> <p>6 up. It's about 3:13 on my clock.</p> <p>7 BY MR. WANGSGARD:</p> <p>8 Q. We touched on it earlier, but can you</p> <p>9 briefly describe to me what the IFCL is, to</p> <p>10 refresh me?</p> <p>11 A. International Foundation for Civil</p> <p>12 Liberties. It is a not-for-profit corporation</p> <p>13 in the state of New York, which I registered</p> <p>14 around 2000, I think, and which essentially is a</p> <p>15 vehicle to fund various groups and activities</p> <p>16 broadly opposing Mr. Putin's regime in Russia</p> <p>17 and around Russia, which was funded by</p> <p>18 Mr. Berezovsky and which was active between 2000</p> <p>19 and I would say 2007.</p> <p>20 Q. Is it no longer active?</p> <p>21 A. It's no longer active. It still</p> <p>22 exists on paper, but there was no activity in</p> <p>23 the past six or seven years or so.</p> <p>24 Q. Does it have any money left?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 185</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. No.</p> <p>3 Q. Did the IFCL provide any funding for</p> <p>4 the lawsuit that we're currently discussing</p> <p>5 against Channel One?</p> <p>6 A. No.</p> <p>7 Q. Do you know what the FGS is?</p> <p>8 A. FGS?</p> <p>9 Q. FGS.</p> <p>10 A. No.</p> <p>11 Q. Did Mr. Berezovsky support Walter</p> <p>12 Litvinenko financially or otherwise?</p> <p>13 A. Yes.</p> <p>14 Q. Can you describe that for me.</p> <p>15 A. Well, he paid for -- he paid money to</p> <p>16 him at the time of Litvinenko's death. Not</p> <p>17 much, but a reasonable -- I don't know how much,</p> <p>18 directly while he was in London and so on, right</p> <p>19 after his death.</p> <p>20 Then Walter traveled back and forth</p> <p>21 and went to different countries. Like I</p> <p>22 remember he went to Czech Republic and had some</p> <p>23 action in front of the Russian Embassy, and it</p> <p>24 was all funded by Boris.</p> <p>25 Then at some point -- I was not</p>



<p style="text-align: right;">Page 186</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 involved in this. At some point Walter moved to</p> <p>3 Italy, and at some point, Boris, Mr. Berezovsky,</p> <p>4 asked me to send him some money from IFCL. I</p> <p>5 think it was about \$40,000 or in that area. It</p> <p>6 was the time when Berezovsky was already in</p> <p>7 financial straits, and Walter had his own</p> <p>8 financial problems in Italy, and that was one</p> <p>9 time when I was financially involved with him.</p> <p>10 Q. With "him" being Walter?</p> <p>11 A. Walter, yes.</p> <p>12 Q. So did Mr. Berezovsky at some point</p> <p>13 stop supporting Walter?</p> <p>14 A. Well, Mr. Berezovsky at some point,</p> <p>15 at around 2010 and later, stopped supporting</p> <p>16 everybody, including IFCL and Marina's legal</p> <p>17 action and so on, because he ran out of money</p> <p>18 essentially.</p> <p>19 Q. Have you ever collaborated with</p> <p>20 British Intelligence Services; MI5, MI6,</p> <p>21 et cetera?</p> <p>22 MR. SELLIER: Hold it a second.</p> <p>23 Would you just read that back?</p> <p>24 (Requested portion of the record was</p> <p>25 read by the reporter at 3:21 p.m.)</p>	<p style="text-align: right;">Page 188</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 important.</p> <p>3 MR. WANGSGARD: Sure. Let's go off</p> <p>4 the record and mute yourself.</p> <p>5 (Off the record at 3:22 p.m.)</p> <p>6 (Back on the record at 3:22 p.m.)</p> <p>7 A. Sorry about that. That's it.</p> <p>8 Yeah, what do I mean? I meant</p> <p>9 that -- what was the question, the last</p> <p>10 question?</p> <p>11 MR. WANGSGARD: Do you mind reading</p> <p>12 back the last answer about "distancing</p> <p>13 themselves from our group"?</p> <p>14 (Requested portion of the record was</p> <p>15 read by the reporter at 3:23 p.m.)</p> <p>16 A. Let me elaborate. I met with them a</p> <p>17 couple of times during Litvinenko's lifetime</p> <p>18 when they were around asking questions about</p> <p>19 matters of interest to them. They were speaking</p> <p>20 to me, they were speaking to Berezovsky. I</p> <p>21 don't know who else. And I see no reason why</p> <p>22 not answer those questions.</p> <p>23 Since I know from the events</p> <p>24 surrounding Litvinenko's death, when he was in</p> <p>25 the hospital, they were -- I mean somebody from</p>
<p style="text-align: right;">Page 187</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. How you define "collaborate"?</p> <p>3 Elaborate on "collaborate."</p> <p>4 BY MR. WANGSGARD:</p> <p>5 Q. Were you ever an intelligence asset</p> <p>6 of British Intelligence?</p> <p>7 A. No. But you have to define "asset."</p> <p>8 I never received any money from them, but I met</p> <p>9 them a couple of times in London.</p> <p>10 Q. When?</p> <p>11 A. It was the time before Litvinenko's</p> <p>12 death, so it would -- I would say around 2003,</p> <p>13 and then -- no, I think that's it, because at</p> <p>14 the time of police investigation of Litvinenko's</p> <p>15 death, they were already trying to distance</p> <p>16 themselves as much as possible from our crowd,</p> <p>17 so we dealt with the police.</p> <p>18 Q. What do you mean by "distancing</p> <p>19 themselves from our crowd"?</p> <p>20 A. Well, I would say that they --</p> <p>21 essentially they disappeared in the woodwork.</p> <p>22 They -- occasionally you could sense them</p> <p>23 around.</p> <p>24 THE WITNESS: Can you hold on? I'll</p> <p>25 just answer that phone call. It's</p>	<p style="text-align: right;">Page 189</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 MI6, I guess, was around there with the police,</p> <p>3 but I didn't -- I kind of knew it indirectly</p> <p>4 from Marina. And then they simply disappeared</p> <p>5 for obvious reasons. It was too public and too</p> <p>6 noisy.</p> <p>7 BY MR. WANGSGARD:</p> <p>8 Q. When was the first time you had a</p> <p>9 meeting with anyone associated with the British</p> <p>10 Intelligence Services?</p> <p>11 A. I think it was sometime in 2002 or</p> <p>12 2003 when Litvinenko arranged for a meeting.</p> <p>13 Q. And the last time you had a meeting</p> <p>14 with someone associated with the British</p> <p>15 Intelligence Services?</p> <p>16 A. I don't remember. Sometime in 2005</p> <p>17 probably.</p> <p>18 Q. Between 2002 and 2005, how many</p> <p>19 contacts would you say you had with British</p> <p>20 Intelligence Services, whether they be in</p> <p>21 person, telephonic, or otherwise?</p> <p>22 A. I would say three, two or three.</p> <p>23 Q. Was it always with the same person or</p> <p>24 persons?</p> <p>25 A. Different persons.</p>



<p style="text-align: right;">Page 190</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Were you paid by anyone associated</p> <p>3 with British Intelligence Services for any</p> <p>4 reason?</p> <p>5 A. No.</p> <p>6 Q. Did you provide them information?</p> <p>7 A. I answered their questions, yes.</p> <p>8 Q. What did their questions pertain to?</p> <p>9 A. In the first meeting, they were -- it</p> <p>10 was before the British-American invasion of</p> <p>11 Iraq, in Iraq, so it should be before 2003, and</p> <p>12 this guy was interested in my professional</p> <p>13 contacts with Russian biologists because they</p> <p>14 knew that I am involved in basic biology and</p> <p>15 whether I know anything which might be some</p> <p>16 sort -- some way interpreted in the, you know,</p> <p>17 Iraqi aspect of Soviet biological weapons. And</p> <p>18 essentially I didn't know anything of the sort,</p> <p>19 and that was it.</p> <p>20 And another time, essentially Sacha</p> <p>21 Litvinenko brought them because they had</p> <p>22 questions related to a member of Berezovsky's</p> <p>23 entourage, an oligarch who fled to Georgia from</p> <p>24 Moscow. It was probably 2002 or so or 2003.</p> <p>25 His name was Badri Patarkatsishvili.</p>	<p style="text-align: right;">Page 192</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 around 2003 or '04 in relation to the Russian</p> <p>3 guy who --</p> <p>4 THE WITNESS: Excuse me, can I</p> <p>5 interrupt for a second? I'll just quiet</p> <p>6 this dog, okay?</p> <p>7 MR. SELLIER: Give him a treat.</p> <p>8 (Off the record at 3:30 p.m.)</p> <p>9 (Back on the record at 3:31 p.m.)</p> <p>10 A. Okay. So the third time, the third</p> <p>11 time was also at that time when there was a guy</p> <p>12 who -- it was the time -- probably it was later.</p> <p>13 It was the time Litvinenko was</p> <p>14 already working in Spain, and there was this</p> <p>15 guy, Litvinenko's friend, in Moscow who got in</p> <p>16 jail and then was released. His name is Mikhail</p> <p>17 Trepashkin, and he also is ex-security officer,</p> <p>18 and they wanted to talk to me about him because</p> <p>19 I knew him, asking essentially whether he was</p> <p>20 okay and -- because Litvinenko wanted to -- him</p> <p>21 to leave Russia and get some sort of a</p> <p>22 consulting position with them.</p> <p>23 So that was the three times I met</p> <p>24 them.</p> <p>25 BY MR. WANGSGARD:</p>
<p style="text-align: right;">Page 191</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Anyway, he is a prominent, very rich</p> <p>3 guy who was Berezovsky's partner, and he -- and</p> <p>4 I knew him quite well, and the Brits wanted to</p> <p>5 see what I think with regard to a theory that</p> <p>6 Badri was a Russian asset in Georgia. And I</p> <p>7 said, no, I don't think so, because at the time</p> <p>8 I understand Badri was, you know, quite active</p> <p>9 in Georgia. He ended up running for president</p> <p>10 of Georgia, but at the time he was not yet. And</p> <p>11 I said, no, I don't think so, and they -- then</p> <p>12 they asked "Do you think it's okay if somebody</p> <p>13 from the embassy talks to him," and I said I</p> <p>14 will ask.</p> <p>15 So I called Badri, who was in</p> <p>16 Georgia, and asked him "Do you mind if British</p> <p>17 spies talk to you," and he says, "No, not at</p> <p>18 all."</p> <p>19 And they -- I knew later on from</p> <p>20 Badri that somebody from the embassy talked to</p> <p>21 him, and he believes that they trusted him that</p> <p>22 he's not a Russian asset, so that was the second</p> <p>23 episode.</p> <p>24 And the third episode when they</p> <p>25 talked to me was later on in relation -- also</p>	<p style="text-align: right;">Page 193</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Just for clarity of the record, when</p> <p>3 you refer to Sacha, that's another name for</p> <p>4 Alexander Litvinenko?</p> <p>5 A. Correct.</p> <p>6 Q. So when we use that today, we all</p> <p>7 understand Sacha is Alexander and Alexander is</p> <p>8 Sacha.</p> <p>9 A. Yes.</p> <p>10 Q. Briefly, why do you think that</p> <p>11 British Intelligence was coming to you to ask</p> <p>12 about the gentleman from Georgia, country of</p> <p>13 Georgia?</p> <p>14 A. Because I knew him quite well, was on</p> <p>15 friendly basis with him, and they wanted</p> <p>16 apparently to establish contact with him or</p> <p>17 somehow vet him. I don't know.</p> <p>18 Q. And, briefly, why do you think they,</p> <p>19 being British Intelligence, was wanting to talk</p> <p>20 to you about anything that touched on biological</p> <p>21 weapons?</p> <p>22 A. Well, it was a very hectic time in</p> <p>23 the run-up to the war in Iraq with biological</p> <p>24 weapons being, you know, in the center of the</p> <p>25 controversy, and I'm a biologist and I knew the</p>



<p style="text-align: right;">Page 194</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 community in Moscow, and apparently that was</p> <p>3 some sort of a fishing operation on their part</p> <p>4 to find out anything which might be remotely</p> <p>5 related to transfer of know-how in the weapons</p> <p>6 area to the Iraqis, but I couldn't help them</p> <p>7 because I don't know anything.</p> <p>8 Q. Did you ever do any work on</p> <p>9 biological weapons or research regarding</p> <p>10 biological weapons?</p> <p>11 A. No, never.</p> <p>12 Q. When you first met with British</p> <p>13 Intelligence Services, did they contact you or</p> <p>14 did you contact them?</p> <p>15 A. Litvinenko brought them. He said "My</p> <p>16 friends want to talk to you," and I said "Sure,</p> <p>17 why not."</p> <p>18 Q. And Litvinenko, during his time in</p> <p>19 London, was on the payroll and working with</p> <p>20 British Intelligence. Is that correct?</p> <p>21 A. Yes.</p> <p>22 Q. If in whatever understanding of the</p> <p>23 term "asset" as it's used in the intelligence</p> <p>24 community, I'll just ask the question again:</p> <p>25 Were you an asset, in your view, of</p>	<p style="text-align: right;">Page 196</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Did you ever work with Israeli</p> <p>3 intelligence agencies?</p> <p>4 A. I never worked with them; however,</p> <p>5 during my five years in Israel, they did</p> <p>6 interview me, as they did any significant</p> <p>7 arrival from the Soviet Union at the time.</p> <p>8 Q. Did you ever work with the FSB?</p> <p>9 A. No.</p> <p>10 Q. Did you ever work with the KGB?</p> <p>11 A. No.</p> <p>12 Q. Have you ever worked with or for the</p> <p>13 United States CIA?</p> <p>14 A. No.</p> <p>15 Q. Have you ever worked with or for the</p> <p>16 United States FBI?</p> <p>17 A. Yes.</p> <p>18 Q. Can you describe that?</p> <p>19 A. I mean I never worked for them, but</p> <p>20 they did come -- they did come talk to me on a</p> <p>21 couple of occasions.</p> <p>22 Q. When was the first time the FBI</p> <p>23 talked to you?</p> <p>24 A. The first time?</p> <p>25 Q. How many times were there</p>
<p style="text-align: right;">Page 195</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 British Intelligence?</p> <p>3 A. How you define "asset" then in the</p> <p>4 present context?</p> <p>5 Q. So if I define an asset as a person</p> <p>6 who is providing information to an outside</p> <p>7 intelligence person or agency, under that</p> <p>8 definition, someone who provides information to</p> <p>9 an outside intelligence person or agency, would</p> <p>10 you be an asset?</p> <p>11 A. Can I ask you to elaborate? If</p> <p>12 someone from the FBI is conducting a security</p> <p>13 check and talks to the neighbors, is the</p> <p>14 neighbor becomes an asset?</p> <p>15 Q. I guess technically under my</p> <p>16 definition, yes; however, contextually, I don't</p> <p>17 think so.</p> <p>18 A. So technically I would say yes, but</p> <p>19 contextually, I don't think I was an asset.</p> <p>20 Q. Did you ever work with Spanish</p> <p>21 intelligence agencies?</p> <p>22 A. No.</p> <p>23 Q. Did you ever work with Italian</p> <p>24 intelligence agencies?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 197</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 approximately?</p> <p>3 A. Let me go back. There was an</p> <p>4 incident with -- actually there were a couple,</p> <p>5 come to think of it, couple of instances where I</p> <p>6 had contact with the CIA without I believe</p> <p>7 working for them. If you want, I can elaborate.</p> <p>8 Q. Please.</p> <p>9 A. Once they came to my work at</p> <p>10 Columbia. I believe they identified themselves</p> <p>11 as the CIA. It was during the Soviet times.</p> <p>12 They were interested in couple of colleagues of</p> <p>13 mine back in Russia, so it should have been</p> <p>14 sometime '81 or '82. And essentially that was</p> <p>15 it. I didn't provide them any meaningful</p> <p>16 information other than general.</p> <p>17 The other time I was in touch with</p> <p>18 the CIA is when I brought the Litvinenkos to the</p> <p>19 American Embassy in Ankara. It is kind of</p> <p>20 well-documented in my book and later in the</p> <p>21 materials of the London inquiry.</p> <p>22 So I did arrange for that meeting. I</p> <p>23 did arrange for that meeting, and then when I</p> <p>24 brought him -- I arranged for that meeting by</p> <p>25 sending my wife Svetlana to the US Embassy and</p>



<p style="text-align: right;">Page 198</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 just, you know, like a walk-in, and she came</p> <p>3 back and said that they are expecting him,</p> <p>4 Litvinenko.</p> <p>5 And then I brought him to the</p> <p>6 embassy, and he was met by a diplomat, and the</p> <p>7 diplomat took us all in the secure room, and</p> <p>8 after brief introduction, he ask me -- she</p> <p>9 actually, it was a woman -- asked me to leave,</p> <p>10 and that's it. And then after they debriefed</p> <p>11 him, they -- she called me and -- after couple</p> <p>12 of days and said that "We have no interest in</p> <p>13 him, come -- no, not couple days, that same day,</p> <p>14 "We have no interest in him, come pick him up,"</p> <p>15 and essentially that was it.</p> <p>16 And I'm quite sure it was the CIA, so</p> <p>17 technically that was the two occasions I dealt</p> <p>18 with them.</p> <p>19 Now, the FBI, the FBI talked to me</p> <p>20 probably two or three times and once even bought</p> <p>21 me lunch.</p> <p>22 First time, it was in New York. They</p> <p>23 were interested what I was doing with a member</p> <p>24 of the Soviet mission at the UN whom I've met</p> <p>25 socially, and they told me -- and I was at</p>	<p style="text-align: right;">Page 200</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 any danger and that sort of thing.</p> <p>3 Q. What was your understanding of why</p> <p>4 the CIA was reaching out to you regarding</p> <p>5 colleagues at the Atomic Institute?</p> <p>6 A. Well, they came right after I went to</p> <p>7 Moscow in 1997 and I wrote this article in The</p> <p>8 New York Times Magazine. So essentially their</p> <p>9 line was that, "Look, you're one of the first of</p> <p>10 the political emigres who went back to Moscow</p> <p>11 and you met people." And I described meeting my</p> <p>12 old colleagues, not only from Atomic Institute,</p> <p>13 but in the field in that article.</p> <p>14 So they said "We read your article,</p> <p>15 and we are interested in what's going on there,</p> <p>16 would you please let us -- identify people whom</p> <p>17 we might quietly approach in Moscow to help us</p> <p>18 with matters of interest."</p> <p>19 And I said, no, I wouldn't do that,</p> <p>20 with all due respect, and they said why, and I</p> <p>21 said "Because you're a bureaucracy, you'll screw</p> <p>22 up and my friends will end up in the slammer,"</p> <p>23 so I would not want to be involved.</p> <p>24 And they said "But if there was a</p> <p>25 war." I said "When the war starts, come back</p>
<p style="text-align: right;">Page 199</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Columbia at the time. And they told me "Do you</p> <p>3 know they're all spies," and I said yes, and</p> <p>4 they said okay and they left.</p> <p>5 The other time they came, if I</p> <p>6 remember correctly, was -- when was that?</p> <p>7 The last time they came actually</p> <p>8 probably was the second time recently after --</p> <p>9 oh, no. The other time they talked to me quite</p> <p>10 a lot. They were investigating the</p> <p>11 disappearance of an American in Chechnya. It</p> <p>12 was a kind of famous case, and I was involved</p> <p>13 with this American, and he was killed apparently</p> <p>14 by some bad actors in Chechnya and the FBI was</p> <p>15 investigating and they came to talk to me. That</p> <p>16 was the second time. It was probably in the</p> <p>17 early -- in 2000 or so. That's second time.</p> <p>18 And the third time was -- when was</p> <p>19 that? I have it in the back of my mind, but if</p> <p>20 I remember, I'll tell you.</p> <p>21 And the last time was after the</p> <p>22 programs we discussed. They called and said</p> <p>23 that they want to talk to me. And I described</p> <p>24 that in my complaint, that they wanted to know</p> <p>25 if everything is quiet around me and do I sense</p>	<p style="text-align: right;">Page 201</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 and we'll talk." So that was the conversation.</p> <p>3 Q. Who was the American who disappeared</p> <p>4 that you referenced?</p> <p>5 A. His name was Fred Cuny, C-U-N-Y, Fred</p> <p>6 Cuny. He was a very prominent relief worker.</p> <p>7 For example, he was in charge of the airlift for</p> <p>8 Kurds in Iraq when Kurds ran away from Saddam</p> <p>9 and were stranded on the mountains, and he</p> <p>10 arranged for an airlift for them.</p> <p>11 So he was a prominent international</p> <p>12 relief worker, and he worked very closely with</p> <p>13 the Department of Defense. I think the</p> <p>14 Secretary of Defense, his name was John</p> <p>15 Shalikashvili or something like that, was his</p> <p>16 personal friend and so on.</p> <p>17 And so I met Fred as part of the</p> <p>18 Soros operation because I was in Moscow running</p> <p>19 a Soros outlet there at the time, and it was the</p> <p>20 time when the war started in Chechnya in 2000 --</p> <p>21 1999, late 1999, 2000, and the Russian army</p> <p>22 besieged and bombed Drozdne and there were</p> <p>23 thousands of refugees running away. And then</p> <p>24 the Soros headquarters sent this guy Fred to me</p> <p>25 and said -- asked me to help him organize the</p>



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<p>1 ALEXANDER GOLDFARB</p> <p>2 mission to Chechnya.</p> <p>3 So we organized for Fred a mission to</p> <p>4 Chechnya because he said that he wanted to</p> <p>5 organize a relief from -- for the refugees from</p> <p>6 the Russian bombings. And Fred went there, and</p> <p>7 then he -- how to put it? He got carried away,</p> <p>8 over my objections, and went too far into trying</p> <p>9 to negotiate or being a go-between the Russian</p> <p>10 generals and the Chechen fighters, and in the</p> <p>11 end, he got killed -- I mean he disappeared.</p> <p>12 Later we learned that he got killed.</p> <p>13 He disappeared, and there was a big</p> <p>14 thing about it because he was friendly with very</p> <p>15 high-ranking officials in Washington. There was</p> <p>16 an investigation and the FBI was involved, so</p> <p>17 they came to ask me about the last days of Fred</p> <p>18 Cuny in Moscow before he went off to Chechnya.</p> <p>19 Q. Do you know if Mr. Cuny ever worked</p> <p>20 for the CIA?</p> <p>21 A. No idea.</p> <p>22 Q. Do you know if he ever worked for the</p> <p>23 FBI?</p> <p>24 A. No idea.</p> <p>25 Q. Do you know if he ever worked for --</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Do you know -- can you give me a</p> <p>3 sample of what those might be?</p> <p>4 A. Well, over years I was on the NBC</p> <p>5 Today Show and Good Morning America and</p> <p>6 MacNeil/Lehrer at the time and news programs of</p> <p>7 CNN couple of times, or three times, and so on.</p> <p>8 Q. And what about talk shows?</p> <p>9 A. Talk shows? Yes. In Britain -- I</p> <p>10 mean by talk shows, you mean with the audience?</p> <p>11 Q. Yes.</p> <p>12 A. Yeah. On the BBC, yes, and probably</p> <p>13 News 4 a couple of times.</p> <p>14 Q. Have you attended and presented or</p> <p>15 spoken at conferences?</p> <p>16 A. The conferences, yes, I did.</p> <p>17 Q. And have you appeared in any</p> <p>18 documentaries at any point?</p> <p>19 A. Yes, many.</p> <p>20 Q. Have the subject of these been</p> <p>21 Litvinenko or --</p> <p>22 A. It was mostly Litvinenko, starting</p> <p>23 from his death and ending with the public</p> <p>24 inquiry, and I guess Skripal maybe.</p> <p>25 Q. What about before his death, so prior</p>
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<p>1 ALEXANDER GOLDFARB</p> <p>2 A. I think he worked for the army. He</p> <p>3 worked for the army.</p> <p>4 Q. Army.</p> <p>5 A. There is a book about him and there</p> <p>6 is an HBO program about him. There's lots of</p> <p>7 detail.</p> <p>8 Q. Other than the two publications we've</p> <p>9 discussed today, specifically your book "Death</p> <p>10 of a Dissident" and your New York Times Magazine</p> <p>11 article "Testing Glasnost," have you been</p> <p>12 published in other mediums or other -- have you</p> <p>13 been published other than the two articles -- or</p> <p>14 book and article that we talked about?</p> <p>15 A. I authored several op-ed pieces</p> <p>16 mostly at the time of the collapse of the Soviet</p> <p>17 Union, and some op-ed pieces at the time of</p> <p>18 Litvinenko's -- shortly after Litvinenko's death</p> <p>19 all over the place. Probably a dozen of them in</p> <p>20 New York Times, in Washington Post, in Wall</p> <p>21 Street Journal and The Guardian and Daily</p> <p>22 Telegraph and so on.</p> <p>23 Q. Have you ever appeared on news</p> <p>24 programs for live broadcast?</p> <p>25 A. Yes.</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 to 2006?</p> <p>3 A. Prior to 2006, yes, of course, during</p> <p>4 the Soviet times when my father was living</p> <p>5 and -- yeah, on the Soviet subjects, yeah, I</p> <p>6 appeared probably several times.</p> <p>7 Q. Did you ever participate with the</p> <p>8 Frontline Club?</p> <p>9 A. Frontline Club is a journalistic club</p> <p>10 in London. I appeared -- I was there definitely</p> <p>11 once or maybe twice with Marina about</p> <p>12 Litvinenko's case.</p> <p>13 Q. What about BBC News Night?</p> <p>14 A. Yes, definitely.</p> <p>15 Q. Did you attend and give a speech at</p> <p>16 the Oxford Union Society?</p> <p>17 A. Yes, I did, on Putin.</p> <p>18 Q. How about the program "Influence"?</p> <p>19 A. I didn't get it, sorry?</p> <p>20 Q. The program "Influence"?</p> <p>21 A. "Influence"? Don't recall.</p> <p>22 Q. Anything by the CBC, the Canadian</p> <p>23 Broadcasting Corporation?</p> <p>24 A. They made a documentary and they put</p> <p>25 me in as one of their talking heads on</p>



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<p>1 ALEXANDER GOLDFARB</p> <p>2 Litvinenko.</p> <p>3 Q. What about Radio Canada?</p> <p>4 A. Radio Canada, I can't remember.</p> <p>5 There's a Russian Radio Canada in Vancouver,</p> <p>6 yes, they interviewed me a couple of times.</p> <p>7 Q. How about the VPRO, which I think is</p> <p>8 the Dutch public broadcasting?</p> <p>9 A. I can't recall. Over the years,</p> <p>10 particularly with Litvinenko and later with</p> <p>11 Skripal, people would call from all over the</p> <p>12 world, you know, to put me for two minutes on</p> <p>13 some news programs, and I don't even remember</p> <p>14 their names.</p> <p>15 Q. The Atlantic Council, have you</p> <p>16 appeared --</p> <p>17 A. Yes, probably -- definitely two</p> <p>18 times, probably three times. Definitely two</p> <p>19 times, all in connection with the Litvinenko</p> <p>20 case. And last one was in connection with our</p> <p>21 lawsuit actually together with Randy.</p> <p>22 THE WITNESS: Remember, Randy?</p> <p>23 MR. SELLIER: How could I forget.</p> <p>24 BY MR. WANGSGARD:</p> <p>25 Q. So it sounds like both -- and tell me</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 dissident."</p> <p>3 A. Because the story was crying for a</p> <p>4 book.</p> <p>5 Q. The story was crying for a book. You</p> <p>6 mean that you thought that the public</p> <p>7 interest --</p> <p>8 A. There was a lot of public interest.</p> <p>9 It was the probably number one news story in UK</p> <p>10 and even in the world for a while, and</p> <p>11 because -- there was tremendous interest because</p> <p>12 we had a story to tell and because we wanted to</p> <p>13 tell the world what we believe happened at the</p> <p>14 time. It was like ten years before all these</p> <p>15 aspects became legally established fact.</p> <p>16 It was essentially our view of the</p> <p>17 story, namely that Mr. Putin and his security</p> <p>18 services killed Litvinenko, so we felt compelled</p> <p>19 to tell the story.</p> <p>20 Q. But do you think it was a matter of</p> <p>21 public concern?</p> <p>22 A. What, the story? Of course, yes.</p> <p>23 Q. In your complaint, Paragraph 108, you</p> <p>24 refer to the death of Alexander Litvinenko as,</p> <p>25 quote, a high profile case. What do you mean by</p>
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<p>1 ALEXANDER GOLDFARB</p> <p>2 if I'm fairly characterizing this, that you've</p> <p>3 had a pretty wide-ranging public persona both</p> <p>4 before Litvinenko and certainly after. Is that</p> <p>5 accurate?</p> <p>6 A. Yes.</p> <p>7 Q. Who's Yuri Rashkin?</p> <p>8 A. Yuri Rashkin is a journalist. I</p> <p>9 believe he's in Boston, although I know him from</p> <p>10 the internet, who runs his own YouTube current</p> <p>11 affairs channel and who interview -- have me as</p> <p>12 a guest a couple of times.</p> <p>13 Q. And is the name of that program "The</p> <p>14 Rashkin Report"?</p> <p>15 A. Yes, that's his channel.</p> <p>16 Q. Would you consider Mr. Rashkin a</p> <p>17 friend?</p> <p>18 A. Well, I've never met him in person.</p> <p>19 I would consider he's good acquaintance of mine.</p> <p>20 Q. Why did you and Marina Litvinenko</p> <p>21 decide to publish the book "Death of a</p> <p>22 Dissident"?</p> <p>23 A. Why did we decide to publish the</p> <p>24 book?</p> <p>25 Q. To write and publish "Death of a</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 a high profile case?</p> <p>3 A. I mean that it was a front page story</p> <p>4 on every newspaper in the world for -- not in</p> <p>5 the world for a day, but for probably a few</p> <p>6 days, on every TV news program, and it became a</p> <p>7 permanent fixture in the discourse of</p> <p>8 West-Russia relations to this day and also is</p> <p>9 probably the -- probably the hallmark of</p> <p>10 Mr. Putin's reign for a couple of hundred years</p> <p>11 to come.</p> <p>12 MR. SELLIER: Well, that may have</p> <p>13 been eclipsed by recent events, but...</p> <p>14 THE WITNESS: No.</p> <p>15 MR. SELLIER: Okay. We're not having</p> <p>16 a discussion.</p> <p>17 Next question, please.</p> <p>18 BY MR. WANGSGARD:</p> <p>19 Q. Have you had media appearances since</p> <p>20 March of 2018?</p> <p>21 A. Since March of 2018, well, several</p> <p>22 probably on Russian media, such as the Rashkin</p> <p>23 Report that you have mentioned. And I don't</p> <p>24 recall offhand any appearances of the Western</p> <p>25 mainstream media except for documentaries</p>



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<p>1 ALEXANDER GOLDFARB</p> <p>2 produced by, you know, networks, but not -- oh,</p> <p>3 yes, there was a story on the BBC. There was a</p> <p>4 big program on the BBC of -- for the anniversary</p> <p>5 of Litvinenko's death, so I was on it.</p> <p>6 Q. Have you published any articles or</p> <p>7 op-eds since March 2018?</p> <p>8 A. Yes. I had an op-ed in Washington</p> <p>9 Post describing essentially my lawsuit.</p> <p>10 Q. At some point did you meet with</p> <p>11 members of the United States Congress to discuss</p> <p>12 the Litvinenko murder?</p> <p>13 A. Yes, several times, several times.</p> <p>14 Q. What was the most recent?</p> <p>15 A. The most recent was in connection</p> <p>16 with our lawsuit filing.</p> <p>17 Q. Was that after the lawsuit? Did</p> <p>18 you --</p> <p>19 A. After we filed it, we went with</p> <p>20 Marina to Washington and had couple of days of</p> <p>21 meetings on The Hill.</p> <p>22 Q. Did you also meet with any senators</p> <p>23 at that time?</p> <p>24 A. Yes.</p> <p>25 Q. Did you have any meetings with the</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 have a list some place.</p> <p>3 Q. I take it Rohrabacher was not someone</p> <p>4 you met with?</p> <p>5 A. Who?</p> <p>6 Q. Dana Rohrabacher.</p> <p>7 A. I met Dana Rohrabacher, of course,</p> <p>8 yeah, he was there. Colorful character.</p> <p>9 Q. And how many personnel from the State</p> <p>10 Department did you meet with?</p> <p>11 A. Well, in this last visit, probably</p> <p>12 five or six from different sections.</p> <p>13 Q. Any other topics other than sanctions</p> <p>14 that you were -- or sanctions that you wanted,</p> <p>15 economic sanctions, that you were engaged in</p> <p>16 these meetings for?</p> <p>17 A. Well, that was our two particular</p> <p>18 talking points, our lawsuit and sanctions, but,</p> <p>19 you know, when you come to those meetings,</p> <p>20 they're general discussions, usual things.</p> <p>21 Q. And who --</p> <p>22 A. Nothing specific I recall.</p> <p>23 Q. Who individually or what</p> <p>24 organizations did you think should be</p> <p>25 sanctioned?</p>
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<p>1 ALEXANDER GOLDFARB</p> <p>2 State Department or State Department personnel?</p> <p>3 A. I think we met with someone at the</p> <p>4 Russian desk of the State Department.</p> <p>5 Q. And the subject of these meetings,</p> <p>6 generally and briefly, how would you describe</p> <p>7 it?</p> <p>8 A. Well, we informed them about our</p> <p>9 lawsuit, saying that it fits into the general</p> <p>10 issue of Russian propaganda and misinformation</p> <p>11 or disinformation, and that -- and that we would</p> <p>12 like to propose -- actually we did it</p> <p>13 publicly -- to include organizations and</p> <p>14 individuals involved in the Russian</p> <p>15 disinformation effort into the US sanctions,</p> <p>16 which led to nowhere at the time.</p> <p>17 Q. And how many representatives did you</p> <p>18 meet with?</p> <p>19 A. Well, over two days, we have probably</p> <p>20 a dozen meetings, some of them with</p> <p>21 representatives and senators, some of them with</p> <p>22 their staff members. I can pull out -- I</p> <p>23 probably have this itinerary still. I remember</p> <p>24 Senator Shaheen, I remember Senator Weicker,</p> <p>25 probably Steny Hoyer. I don't remember, but I</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 A. I would say top executives of the</p> <p>3 propaganda outlets that are out there. I think</p> <p>4 they already sanctions many of them by now --</p> <p>5 sanctioned, have been sanctioned. Certainly</p> <p>6 Russia Today, and then everybody else;</p> <p>7 Channel One, Russia 1, NTV, Sputnik, TASS, so a</p> <p>8 whole list.</p> <p>9 Q. Other than meetings on The Hill or</p> <p>10 meetings at the State Department, did you meet</p> <p>11 with any other representatives of the United</p> <p>12 States Government or United States Government</p> <p>13 organizations during that time?</p> <p>14 A. No, not during this visit. Earlier</p> <p>15 visits maybe, but I don't remember, such as</p> <p>16 USAID, you know, that sort of thing.</p> <p>17 Q. What about NSA, the National</p> <p>18 Security --</p> <p>19 A. No.</p> <p>20 Q. CIA at any point? Have you met with</p> <p>21 the CIA in Washington?</p> <p>22 A. No, that I know of.</p> <p>23 MR. WANGSGARD: I just shared a</p> <p>24 document on the screen, which I think we're</p> <p>25 up to D, so I'll mark this as Exhibit D.</p>



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<p>1 ALEXANDER GOLDFARB 2 (DEPOSITION EXHIBIT D MARKED 3 FOR IDENTIFICATION at 4:05 p.m.) 4 MR. WANGSGARD: It's a nine-page 5 document bearing Bates stamps G000640 6 through G000648. 7 MR. SELLIER: Kendall, what tab? 8 MR. WANGSGARD: Tab 5. 9 BY MR. WANGSGARD: 10 Q. And at the top, the first page is 11 titled "Alex Goldfarb's Blog on Echo.msk.ru." 12 Do you recognize this nine-page 13 document? 14 A. Yes. 15 Q. What is it? 16 A. It's a list of my posts on my blog on 17 a Moscow-based radio called Echo Moscow, which 18 no longer exists. It was dissolved yesterday 19 because of the war in Ukraine. 20 Q. And there's a series of Echo listed 21 blogs through Page 644, and then we have on Page 22 Number 6 of the document bearing the Bates stamp 23 645, we have something -- a list of Alex 24 Goldfarb's blogs on Snob.ru? 25 A. Yes.</p>	<p>1 ALEXANDER GOLDFARB 2 live journal? 3 A. No. 4 Q. So is there a reason why there would 5 be a post dated October 1, 2021 titled "Finally 6 a Feature Film About Litvinenko"? 7 A. Really? What can I tell you. I 8 don't know. Probably it's a duplicate of 9 something else or I may have overlooked it. Too 10 many of them. 11 Q. How about June 8th, 2020 titled "On 12 Jews, Blacks and America's Cultural Choices"? 13 A. Is it related to the current issue? 14 Q. It's just a blog post on the live 15 journal blog that you don't recall? 16 A. I recall that I wrote something like 17 that, but I wouldn't say it had any relation to 18 the -- our lawsuit or the programs. 19 Q. For the blogs that are listed on 20 Exhibit D, are these maintained by you? 21 A. Yes. 22 Q. Does anyone else maintain them or 23 update them? 24 A. No. 25 Q. Are the posts on here authored by</p>
Page 215	Page 217
<p>1 ALEXANDER GOLDFARB 2 Q. What are these? 3 A. It's my posts on a blog which I have 4 on this internet portal, Snob.ru, which 5 publishes opinion stories, culture, politics, 6 and so on. 7 Q. And then at the bottom of Page G647, 8 the heading is "Alex Goldfarb's Blogs on 9 Grani.ru. What are these? 10 A. This is my other -- another blog of 11 mine, and it lists my posts there. Grani.ru is 12 Russian language internet portal which I believe 13 had moved from Moscow to Paris some while ago. 14 Q. Is there a reason that blogs found 15 under the blog AlexGoldfarb.livejournal.com are 16 not listed in these pages? 17 A. I don't think there is a particular 18 reason. They're probably duplicates of what I 19 have here or I might have overlooked them. 20 Q. Do you know when the last time you 21 posted on AlexGoldfarb.livejournal.com was? 22 A. Quite a while ago. It was at the 23 time of a public inquiry in London. We were 24 fundraising on that blog. 25 Q. Does anyone else have access to that</p>	<p>1 ALEXANDER GOLDFARB 2 you? 3 A. Yes. 4 Q. Does anybody else author the posts on 5 here? 6 A. No. 7 Q. Are they edited by anybody? 8 A. No. 9 Q. Does anyone contribute to the posts 10 other than yourself? 11 A. No. 12 Q. Do you preview them to anyone else 13 before posting them? 14 A. No. 15 Q. Is it fair to say then that these are 16 your words and your words alone? 17 A. Yes, that's my words alone. 18 Q. Do you stand by the blog posts that 19 you've posted on these -- listed here on 20 Exhibit D? 21 A. Yes. 22 MR. WANGSGARD: I'm going to enter as 23 Exhibit E, which, Randy, is Tab 6. 24 MR. SELLIER: Thank you. 25 MR. WANGSGARD: Is a two-page blog</p>



<p style="text-align: right;">Page 218</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 post written in Russian.</p> <p>3 (DEPOSITION EXHIBIT E MARKED</p> <p>4 FOR IDENTIFICATION at 4:11 p.m.)</p> <p>5 BY MR. WANGSGARD:</p> <p>6 Q. Could you tell me what the date of</p> <p>7 this blog post is? I can zoom in.</p> <p>8 A. June 18, 2018 or June 19 -- yeah, 19</p> <p>9 of June of 2018.</p> <p>10 Q. And the title of the blog post to the</p> <p>11 left of your portrait?</p> <p>12 A. "We're Going to Sue Channel One and</p> <p>13 RT."</p> <p>14 Q. And then can you read the first line</p> <p>15 and a half of this through the first question</p> <p>16 mark that you see there?</p> <p>17 A. Yes.</p> <p>18 "When you happen to become a target</p> <p>19 of an exotic, very crude slander, your</p> <p>20 first reaction is to brush it aside as a</p> <p>21 bad joke."</p> <p>22 Meaning that who would believe this</p> <p>23 kind of crap. Shall I continue?</p> <p>24 Q. Yes, please, with the next one.</p> <p>25 A. Well, the next phrase:</p>	<p style="text-align: right;">Page 220</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 so that I can count the paragraphs. That's one,</p> <p>3 two, three -- fourth paragraph, right?</p> <p>4 Q. Correct. Last two sentences right</p> <p>5 around here.</p> <p>6 A. Last two sentences, okay.</p> <p>7 "I confess I'm not a big fan of</p> <p>8 Putin, who poisoned my friend, and I don't</p> <p>9 really care what Putin's media -- "I don't</p> <p>10 care that Putin's media project my demonic</p> <p>11 image to the millions of Russian viewers.</p> <p>12 This audience has been lost to reality a</p> <p>13 long time ago."</p> <p>14 Seriously lost to reality certainly.</p> <p>15 Q. What do you mean by "This audience</p> <p>16 has been lost to reality a long time ago"?</p> <p>17 A. I'm saying that the majority of the</p> <p>18 viewers of Channel One in Russia have been</p> <p>19 brainwashed to the point that they are unable</p> <p>20 and devoid of any other sources of information</p> <p>21 so that they lost any ability to have a rational</p> <p>22 judgment or to use common sense when they --</p> <p>23 even when they hear grotesque lies.</p> <p>24 MR. WANGSGARD: How about five</p> <p>25 minutes comfort break?</p>
<p style="text-align: right;">Page 219</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 "But then you realize that 60 million</p> <p>3 people heard that you are a murderer and</p> <p>4 your friends call to tell that they don't</p> <p>5 believe a word of what was said about you</p> <p>6 on TV, you grow uneasy."</p> <p>7 Q. Did you have friends calling you and</p> <p>8 saying that they didn't believe a word of what</p> <p>9 they saw about you on TV?</p> <p>10 A. Yes, I do.</p> <p>11 Q. Did you have any friends calling you</p> <p>12 and telling you that they did believe what they</p> <p>13 saw on TV?</p> <p>14 A. Not my friends, no.</p> <p>15 Q. Approximately how many friends or</p> <p>16 relatives or any other acquaintances reached out</p> <p>17 to you telling you they did not believe --</p> <p>18 A. Three or four.</p> <p>19 Q. And approximately when did that</p> <p>20 happen?</p> <p>21 A. Right after the first program.</p> <p>22 Q. Skipping ahead to the fourth</p> <p>23 paragraph, can you read the last two sentences,</p> <p>24 "And I don't give a damn that Putin's media."</p> <p>25 A. Well, if you could slowly scroll it</p>	<p style="text-align: right;">Page 221</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 (Recess taken at 4:17 p.m.)</p> <p>3 (Back on the record at 4:26 p.m.)</p> <p>4 MR. WANGSGARD: So let's go back on</p> <p>5 the record.</p> <p>6 I'm going to share my screen. Randy,</p> <p>7 this is Tab 7.</p> <p>8 MR. SELLIER: Okay.</p> <p>9 MR. WANGSGARD: Which I'll mark as</p> <p>10 Exhibit F.</p> <p>11 (DEPOSITION EXHIBIT F MARKED</p> <p>12 FOR IDENTIFICATION at 4:27 p.m.)</p> <p>13 MR. WANGSGARD: It's a two-page</p> <p>14 document written in Russian, appears to be</p> <p>15 from the blog posts of Dr. Goldfarb.</p> <p>16 BY MR. WANGSGARD:</p> <p>17 Q. Could you let me know what the date</p> <p>18 of this is in Russian, please?</p> <p>19 A. 25th of July 2018.</p> <p>20 Q. And the title of this post, so after</p> <p>21 your name?</p> <p>22 A. The title of this post is "The Legal</p> <p>23 Chronicle from New York," Issue Number 3, "The</p> <p>24 Trace of a Chameleon Grandfather."</p> <p>25 MR. SELLIER: Say that again?</p>



<p style="text-align: right;">Page 222</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 THE WITNESS: The footsteps, let's</p> <p>3 put it, footsteps or a trace of a chameleon</p> <p>4 grandfather.</p> <p>5 MR. SELLIER: Okay.</p> <p>6 BY MR. WANGSGARD:</p> <p>7 Q. Can you read and translate, please,</p> <p>8 for me, this third paragraph near my cursor,</p> <p>9 which roughly starts "He lies as they say, but</p> <p>10 does not blush."</p> <p>11 A. Yeah. "As they say, he lies, but</p> <p>12 doesn't blush."</p> <p>13 Q. And then continue, please.</p> <p>14 A. "But we did not include him in the</p> <p>15 list of defendants, not only because he</p> <p>16 doesn't fall under American jurisdiction as</p> <p>17 opposed to the two TV channels, but also</p> <p>18 because we do not want this lawsuit to be</p> <p>19 portrayed as a sort of family squabble."</p> <p>20 Meaning the widow is suing her</p> <p>21 father-in-law because VA, meaning Walter, is not</p> <p>22 an independent actor, and our conflict is not</p> <p>23 with him, but with him puppeteers -- with his</p> <p>24 puppeteers.</p> <p>25 (Reporter clarification.)</p>	<p style="text-align: right;">Page 224</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. Russian courts won't do for the</p> <p>3 reasons which are amply elaborated upon in our</p> <p>4 jurisdictional exchanges.</p> <p>5 Q. Why is it that your conflict is not</p> <p>6 with Walter?</p> <p>7 A. Because Walter, in my view, is a pawn</p> <p>8 in the propaganda war that Russian media, and</p> <p>9 Channel One in particular, is waging against me</p> <p>10 and Marina.</p> <p>11 Q. Why if he was a defendant do you</p> <p>12 think that it would be portrayed as some sort of</p> <p>13 family squabble?</p> <p>14 A. Because Channel One Russia,</p> <p>15 particularly the program "Let Them Talk," is</p> <p>16 specializing in the sort of family squabble</p> <p>17 themes.</p> <p>18 Q. That's interesting. So tell me, what</p> <p>19 is your understanding of the program "Let Them</p> <p>20 Talk"?</p> <p>21 A. "Let Them Talk" is a talk show which</p> <p>22 most of the times focus on high profile cases</p> <p>23 which are not really political. So they like</p> <p>24 very much their producers and their presenters</p> <p>25 to expose family squabbles, among other things.</p>
<p style="text-align: right;">Page 223</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 Q. And so just to clarify, I think</p> <p>3 you've answered it, but in the prior paragraph</p> <p>4 we referred to, it refers to Walter</p> <p>5 Alexandrovich Litvinenko. Is that where the VA</p> <p>6 comes from, so from the --</p> <p>7 A. Correct, it's name and patron name.</p> <p>8 It's an abbreviation of his name and patron</p> <p>9 name.</p> <p>10 Q. And so in this paragraph, the "he's"</p> <p>11 are referring to Alexander Litvinenko's father?</p> <p>12 A. Correct.</p> <p>13 Q. Did you consider suing Walter</p> <p>14 considering he's the one who actually made the</p> <p>15 statements at issue?</p> <p>16 A. My understanding, which may be wrong,</p> <p>17 at the time -- it was before I think Randy came</p> <p>18 on board. My understanding at the time is that</p> <p>19 the respondent must have some sort of presence</p> <p>20 in New York, like Channel One Russia, for</p> <p>21 example, but Walter was not, so I was not sure</p> <p>22 that I could sue him in the American court, but</p> <p>23 maybe I'm wrong.</p> <p>24 Q. Have you sought to sue him in Russian</p> <p>25 court?</p>	<p style="text-align: right;">Page 225</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 This is not the case presently, and</p> <p>3 as I think anybody who watches them would see</p> <p>4 that this particular program is out of character</p> <p>5 with their general sort of programming.</p> <p>6 Q. Is "Let Them Talk" a news program?</p> <p>7 A. No, it's a talk show.</p> <p>8 Q. Is there an American equivalent that</p> <p>9 you can give me of what -- you know, the Jerry</p> <p>10 Springer, is it "60 Minutes," is it somewhere on</p> <p>11 the spectrum between the two?</p> <p>12 A. I don't watch much of American TV.</p> <p>13 This is definitely not "60 Minutes." The other</p> <p>14 program is -- the "Man and Law" is more like</p> <p>15 "60 Minutes." This one, "Let Them Talk" is</p> <p>16 probably close to Oprah Winfrey, if I</p> <p>17 understand, or probably close to -- you know</p> <p>18 what, Geraldo Rivera, is this kind of program.</p> <p>19 That's what it reminds me of.</p> <p>20 MR. WANGSGARD: Sharing what I will</p> <p>21 mark or designate as Exhibit G.</p> <p>22 Randy, this is Tab 8.</p> <p>23 MR. SELLIER: Thank you.</p> <p>24 MR. WANGSGARD: A two-page blog post</p> <p>25 from the Echo blog of Dr. Goldfarb.</p>



<p style="text-align: right;">Page 226</p> <p>1 ALEXANDER GOLDFARB 2 (DEPOSITION EXHIBIT G MARKED 3 FOR IDENTIFICATION at 4:36 p.m.) 4 BY MR. WANGSGARD: 5 Q. Could you read for me, please, the 6 date that's written up here in Russian? 7 A. July 29, 2018. 8 Q. And the title here to the left of 9 your portrait? 10 A. That's "New York Court Chronicles 11 Number 4, the Defamation Law and How We are 12 Going to Defeat -- well, that's a Russian term, 13 "zombo yashik." This is a kind of a I would say 14 mocking term widely used among the educated 15 classes in Russia to refer to the propaganda TV. 16 I could translate it probably best way as 17 brainwashing box, how we're going to defeat the 18 brainwash box. Everybody in Russia would 19 understand. 20 Q. And does the brainwashing box just 21 refer to television generally or specifically -- 22 A. No. Brainwash box is a generic term 23 for Russian state-controlled TV which brainwash 24 the population, and this is how they refer to by 25 anybody -- by any thinking person in Russia,</p>	<p style="text-align: right;">Page 228</p> <p>1 ALEXANDER GOLDFARB 2 Litvinenko and myself." Can you read the 3 first -- 4 A. "Regarding Marina," right? 5 "Regarding Marina Litvinenko and 6 myself, the defendants will easily prove 7 that we are public figures and therefore 8 we're covered by this caveat or this rule." 9 I refer here to the actual malice. 10 "And so we will have to prove that 11 the lies that were broadcast was 12 predetermined and malicious." 13 Q. So what do you mean when you say that 14 "we're going to have to prove actual malice"? 15 A. I mean that we have to prove that 16 when they -- that it was an actual malice, that 17 they -- that it was a predetermined lies which 18 was, as it says here, premeditated lie, let's 19 put it that way. If you translate that 20 correctly, it was malicious and premeditated. 21 Q. And based on some of your 22 publications, it seems like you're familiar with 23 at least the libel case of New York Times versus 24 Sullivan. Is that correct? 25 A. Yes.</p>
<p style="text-align: right;">Page 227</p> <p>1 ALEXANDER GOLDFARB 2 which are not many. 3 Q. The first line here to the left of my 4 cursor, does that say "Previous issues here, 5 Number 1, Number 2, Number 3"? 6 A. Yes. 7 Q. Could you read the next couple 8 sentences for me through the question mark? 9 A. "Well, in connection to our lawsuit, 10 our libel lawsuit against Channel One and 11 RT, we had to research American -- relevant 12 American law. I'm going to -- I'll try to 13 explain here what they are and how we're 14 going to use them, and not only for general 15 educational reasons, but also because some 16 potential sponsors of this project 17 expressed doubts as to the legal merits of 18 this lawsuit basing on many popular myths 19 and misunderstandings." 20 Q. All right. I'm going to skip over to 21 the first paragraph, first full paragraph of 22 Page 2 at the -- one moment. 23 Sorry. We'll skip down to the bottom 24 of Page 1. This is the third paragraph from the 25 bottom. It looks like it says "Regarding Marina</p>	<p style="text-align: right;">Page 229</p> <p>1 ALEXANDER GOLDFARB 2 Q. And although not a legal expert, 3 unless you tell me otherwise, it sounds like 4 when you're referring to the actual malice 5 standard, you're using it in the -- sort of the 6 legal sense based on your understanding of 7 applicable libel law. Is that correct? 8 A. Correct. 9 Q. And do you know why, in your opinion, 10 an actual malice standard should apply to you in 11 this case? 12 A. Because I believe and I guess we have 13 sufficient evidence to prove that when 14 Channel One alleged that I did all those 15 things -- I won't list them -- they knew that 16 this is a lie. 17 MR. SELLIER: That wasn't what he 18 asked you, Alex. 19 THE WITNESS: No? What was the 20 question? 21 MR. SELLIER: I believe he asked you 22 why do you believe the actual malice 23 standard applies to you. 24 THE WITNESS: To my lawsuit, you 25 mean?</p>

58 (Pages 226 to 229)



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<p>1 ALEXANDER GOLDFARB</p> <p>2 MR. SELLIER: Yes, that's what he</p> <p>3 asked you.</p> <p>4 A. Because I believe they knew that they</p> <p>5 were lying when they lied.</p> <p>6 BY MR. WANGSGARD:</p> <p>7 Q. So not so much why do you think that</p> <p>8 you satisfy that, but why should that standard</p> <p>9 be held to you? Is it because, as you reference</p> <p>10 in this paragraph with regard to Marina</p> <p>11 Litvinenko and me, the defendants will easily</p> <p>12 prove that we are public figures?</p> <p>13 A. Yes.</p> <p>14 Q. And you're a public figure.</p> <p>15 A. Yeah, I would believe we are public</p> <p>16 figures, which we are, and that means that the</p> <p>17 standard applies to us, the standard of actual</p> <p>18 malice. That's what I meant here.</p> <p>19 Q. Are you a public figure with respect</p> <p>20 to this case, or do you think you're a public</p> <p>21 figure because of your other --</p> <p>22 A. No, I understand that I am a -- I'll</p> <p>23 call it limited purpose public figure with</p> <p>24 regard to a large -- a large area of discourse</p> <p>25 like connected to Russia, Putin, and all that.</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 statement was drafted by Litvinenko's lawyer by</p> <p>3 the name of George Menzies, and then I -- after</p> <p>4 he had spoken to Litvinenko in my presence and I</p> <p>5 translated and after he had drafted this</p> <p>6 statement, we went back to his hospital ward,</p> <p>7 and I back translated what he had drafted into</p> <p>8 Russian in the presence of Marina, and</p> <p>9 Litvinenko agreed and signed it.</p> <p>10 Q. Did you edit it or did you just</p> <p>11 translate it?</p> <p>12 A. I just translated. Was a good</p> <p>13 statement.</p> <p>14 Q. And what was Alexander Litvinenko's</p> <p>15 condition at the time?</p> <p>16 A. At the time he signed the statement,</p> <p>17 you mean?</p> <p>18 Q. Yes.</p> <p>19 A. He was very ill, but perfectly</p> <p>20 coherent and in his sound mind. It was -- on</p> <p>21 that day, he still gave evidence to the police.</p> <p>22 Q. Were you acting as -- either formally</p> <p>23 or in an informal capacity as his spokesman</p> <p>24 during the time that he was in the hospital, at</p> <p>25 University Hospital in London?</p>
Page 231	Page 233
<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. So with regard to topics such as</p> <p>3 Russia and Putin, you're at least a limited</p> <p>4 purpose public figure, is your understanding?</p> <p>5 A. Yes.</p> <p>6 Q. And how about topics such as</p> <p>7 Litvinenko?</p> <p>8 A. Definitely, because it's part of the</p> <p>9 Russia issue.</p> <p>10 Q. Poisonings by or allegedly by</p> <p>11 apparatuses of the Russian government included</p> <p>12 in that?</p> <p>13 A. I don't think I'm -- well, I'm</p> <p>14 definitely now a public figure with this regard</p> <p>15 because I was associated with a very public and</p> <p>16 prominent case of Litvinenko.</p> <p>17 Q. Following the publication of your</p> <p>18 book "Death of a Dissident" and --</p> <p>19 A. No, following the moment I read out</p> <p>20 Litvinenko's deathbed statement to the press on</p> <p>21 the day he died, and on and on and on.</p> <p>22 Q. Did you draft that statement?</p> <p>23 A. Did I what?</p> <p>24 Q. Did you draft that statement?</p> <p>25 A. I didn't draft this statement. This</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 A. I would say that the best</p> <p>3 characterization of my role, friend, spokesman.</p> <p>4 Q. Friend, spokesman?</p> <p>5 A. Yeah.</p> <p>6 Q. The paragraph beginning after the</p> <p>7 question "How are we going to do it," could you</p> <p>8 read that to me, please?</p> <p>9 A. "First of all, basing on the findings</p> <p>10 of the London's public inquiry, Litvinenko</p> <p>11 public inquiry, which in 2006 established</p> <p>12 that he was murdered by Andrei Lugovoi and</p> <p>13 Dmitry Kovtun, Channel One and RT could not</p> <p>14 have not known about these findings since</p> <p>15 they reported on them themselves. Of</p> <p>16 course they can say that they consider</p> <p>17 public inquiry illegitimate and politically</p> <p>18 influenced, and then the American court</p> <p>19 will have to decide whether this was an</p> <p>20 honest misunderstanding of our respondents</p> <p>21 or was it part of their malicious plan."</p> <p>22 Q. Thank you. So it sounds like at the</p> <p>23 time of writing this, it's an open question in</p> <p>24 the US courts under -- your understanding of</p> <p>25 whether this was a good faith error or malicious</p>



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<p>1 ALEXANDER GOLDFARB</p> <p>2 intent?</p> <p>3 A. No. What I say that we will insist</p> <p>4 that they knew, that they're lying basing on the</p> <p>5 London inquiry finding, which they reported</p> <p>6 themselves upon, but if they object, then the</p> <p>7 American court will have to decide on the issue</p> <p>8 of actual malice. That's what I'm saying.</p> <p>9 Q. Would you describe Marina Litvinenko</p> <p>10 as, quote, an unconditional interested party in</p> <p>11 your action?</p> <p>12 A. What does mean unconditional? Sounds</p> <p>13 very legal, legalese, unconditional interest.</p> <p>14 MR. WANGSGARD: So I will pull up and</p> <p>15 mark as H, Exhibit H, Tab 10, Randy.</p> <p>16 (DEPOSITION EXHIBIT H MARKED</p> <p>17 FOR IDENTIFICATION at 4:49 p.m.)</p> <p>18 MR. WANGSGARD: Which I'm sharing</p> <p>19 now.</p> <p>20 BY MR. WANGSGARD:</p> <p>21 Q. This is a two-page document. Again,</p> <p>22 appears to be from the Echo blog of Dr. Goldfarb</p> <p>23 written in Russian. And the date on it, if you</p> <p>24 could tell us, is that --</p> <p>25 A. It's the 9th of February 2019.</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 interested party.</p> <p>3 Q. In what way?</p> <p>4 A. In the way that the -- her husband</p> <p>5 and the father of her child was viciously</p> <p>6 murdered. And to add insult to injury, somebody</p> <p>7 is spreading misinformation with regard to who</p> <p>8 kill him. She obviously would -- anybody in her</p> <p>9 place would want to set the record straight.</p> <p>10 MR. WANGSGARD: I'm going to share on</p> <p>11 my screen and mark as I, Exhibit I, a</p> <p>12 one-page document, which is Tab 11, Randy.</p> <p>13 (DEPOSITION EXHIBIT I MARKED</p> <p>14 FOR IDENTIFICATION at 4:52 p.m.)</p> <p>15 BY MR. WANGSGARD:</p> <p>16 Q. And it appears to be dated March 4th,</p> <p>17 2019. Is that correct?</p> <p>18 A. Yes, it's March 4, 2019.</p> <p>19 Q. And is this -- I guess what's the</p> <p>20 title of this to the left of your portrait</p> <p>21 there?</p> <p>22 A. The title is "Legal Chronicles from</p> <p>23 New York -- or "Court Chronicles from New York</p> <p>24 Number 12, the CIA and Déjà Vu."</p> <p>25 Q. "The CIA and Déjà Vu." What do you</p>
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<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. And the title?</p> <p>3 A. The title is "The Legal Chronicle</p> <p>4 from New York, Number 11," and so on Monday</p> <p>5 dash.</p> <p>6 Q. And could you read the first say</p> <p>7 three sentences of the second paragraph that</p> <p>8 look to begin "Although I'm an only plaintiff"?</p> <p>9 A. "Even though I'm the sole plaintiff,</p> <p>10 I use -- I'm writing our lawsuit and not</p> <p>11 my lawsuit for two reasons. First of all,</p> <p>12 because Marina Litvinenko, the widow, is</p> <p>13 undoubtedly an interested party in this</p> <p>14 case."</p> <p>15 Q. Thank you. So my translation of</p> <p>16 "unconditional," we'll use your words of</p> <p>17 "undoubtedly an interested party." What do you</p> <p>18 mean by that?</p> <p>19 A. Well, you can translate both ways,</p> <p>20 but that's what I meant; undoubtedly she's an</p> <p>21 interested party. I simply don't understand</p> <p>22 what unconditional interested party is.</p> <p>23 Q. So what do you mean by she's</p> <p>24 undoubtedly an interested party?</p> <p>25 A. That without any doubt she's an</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 mean by that?</p> <p>3 A. I mean that these are two themes that</p> <p>4 they want to address; the theme of CIA and the</p> <p>5 theme of déjà vu is obvious from the content.</p> <p>6 Q. So the one, two -- third paragraph</p> <p>7 from the bottom, could you read to me what</p> <p>8 begins on the second -- you know, is that the</p> <p>9 second message?</p> <p>10 A. "The second news story is the</p> <p>11 emotional rebuttal of a lady from Russian</p> <p>12 foreign ministry directed to the Brits, who</p> <p>13 defamed the Russian ambassador because --</p> <p>14 "defaming the Russian ambassador. As you</p> <p>15 see, he was called the KGB agent, which is</p> <p>16 malicious propaganda -- I mean in the words</p> <p>17 of the foreign minister spokeswoman, so I'll</p> <p>18 repeat.</p> <p>19 "The second news story is the</p> <p>20 emotional rebuttal of a lady from ministry</p> <p>21 of foreign affairs towards Brits, who</p> <p>22 slandered or defamed the Russian ambassador</p> <p>23 by saying that he was a KGB agent, which is</p> <p>24 a piece of malicious propaganda. For</p> <p>25 example -- I continue, right?</p>

60 (Pages 234 to 237)



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<p>1 ALEXANDER GOLDFARB</p> <p>2 Q. Yes, the next sentence, "Last year</p> <p>3 Russian TV channels."</p> <p>4 A. "For example, Russian TV channels</p> <p>5 last year called me an agent of CIA who</p> <p>6 murdered Litvinenko. I, as is known, sued</p> <p>7 them, brought them to court, and now the</p> <p>8 attorney for the Russia Today channel wrote</p> <p>9 to the judge that the allegation of</p> <p>10 belonging to the CIA could not be</p> <p>11 considered slanderous. Here I agree."</p> <p>12 Q. Okay. So "Here I agree," what do you</p> <p>13 mean by "Here I agree"?</p> <p>14 A. I agree that allegation of belonging</p> <p>15 to the CIA are not slander per se.</p> <p>16 Q. Not slander per se or --</p> <p>17 A. What I say, I agree here, I agree</p> <p>18 with that, I'm in agreement.</p> <p>19 Q. It's not defamatory or</p> <p>20 (indiscernible) --</p> <p>21 A. It's not defamatory, yes.</p> <p>22 (Reporter clarification.)</p> <p>23 Q. -- or slanderous to be accused of</p> <p>24 being a CIA agent.</p> <p>25 A. Yeah, here I agree. What I mean is</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 Alexander Litvinenko and his own wife, as</p> <p>3 well as being an agent of the United States</p> <p>4 Central Intelligence Agency."</p> <p>5 Whether it's true or false -- well,</p> <p>6 first of all, is it true or false that you're a</p> <p>7 member of the CIA?</p> <p>8 A. It's false. I'm not the member of</p> <p>9 the CIA.</p> <p>10 Q. Even if that false statement was made</p> <p>11 about you, is it defamatory or slanderous to be</p> <p>12 accused of being a member of the CIA, in your</p> <p>13 opinion?</p> <p>14 A. I would say that being a murderer is</p> <p>15 obviously slanderous; and when you say that</p> <p>16 someone is a murderer on behalf of the CIA is</p> <p>17 also slanderous; and when you add to this some</p> <p>18 additional facets to this whole statement that</p> <p>19 he is a murderer on behalf of the CIA because he</p> <p>20 administered a poison given to him by the CIA in</p> <p>21 order to prevent the victim of traveling to</p> <p>22 Russia, this whole situation is very, very</p> <p>23 slanderous and each element of this statement</p> <p>24 reinforces all other elements.</p> <p>25 So in the context, it's very</p>
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<p>1 ALEXANDER GOLDFARB</p> <p>2 that I agree that -- with the attorney for</p> <p>3 Russia Today who asserts that alleging that</p> <p>4 someone belongs to the CIA by itself is not</p> <p>5 defamatory.</p> <p>6 Q. Is it defamatory when taken with</p> <p>7 something else?</p> <p>8 A. Well, it's a gray area. It depends</p> <p>9 on the context. For example, in some parts and</p> <p>10 some times, saying that somebody is gay may be</p> <p>11 defamatory, but generally nowadays it is not.</p> <p>12 So -- so I agree that -- with that</p> <p>13 statement, let's put it that way. "I agree with</p> <p>14 that statement of the Russia Today lawyer even</p> <p>15 though -- shall I continue?</p> <p>16 Q. No, that's good, thank you.</p> <p>17 So I'm going to read to you</p> <p>18 Paragraph 1 of your complaint, Document 5 in</p> <p>19 this matter, which says in the second</p> <p>20 paragraph -- or in the second sentence of</p> <p>21 Paragraph 1:</p> <p>22 "Dr. Goldfarb brings this action</p> <p>23 because he's a victim of malicious</p> <p>24 defamation by defendants who have falsely</p> <p>25 accused him of murdering his friend,</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 slanderous, although I agree that technically</p> <p>3 calling let's say somebody an agent of the CIA</p> <p>4 is let's say not slanderous, but it puts the</p> <p>5 object in -- objective -- I mean the -- sorry</p> <p>6 for the -- it puts the person in a very serious</p> <p>7 objective danger and does harm. It's harmful</p> <p>8 but not slanderous. It's harmful for other</p> <p>9 reasons. I hope I'm clear --</p> <p>10 Q. Standing alone, being a member of the</p> <p>11 CIA, whether true or false, is not slanderous.</p> <p>12 A. No.</p> <p>13 Q. Is that what you said? No, okay.</p> <p>14 A. Standing alone, no. In the context</p> <p>15 of this story, it is.</p> <p>16 Q. So the basis of your complaint is</p> <p>17 that you've been accused of being a murderer of</p> <p>18 two people. Is that correct?</p> <p>19 A. Yes.</p> <p>20 Q. And also the basis of your complaint</p> <p>21 is that you're a CIA agent with respect to those</p> <p>22 murders?</p> <p>23 A. Yes.</p> <p>24 Q. So really the basis of the complaint</p> <p>25 is the murderer accusation, not the CIA agent</p>



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<p>1 ALEXANDER GOLDFARB</p> <p>2 accusation.</p> <p>3 A. Can you please repeat it?</p> <p>4 Q. So isn't it true then that the basis</p> <p>5 of your complaint is that you've been accused of</p> <p>6 being a murderer, not that you've been accused</p> <p>7 of being a CIA agent?</p> <p>8 A. Well, it's becomes a linguistical</p> <p>9 issue. I would say the accusation that I'm a</p> <p>10 murderer wouldn't stand by itself because nobody</p> <p>11 would believe that all of a sudden I would go</p> <p>12 and kill my good friend and my own wife. So</p> <p>13 it's an incredible allegation which any</p> <p>14 reasonable person wouldn't take seriously.</p> <p>15 However, if you say that he had done</p> <p>16 this bad deed because he had a motive, it's a</p> <p>17 much more serious slanderous allegation.</p> <p>18 And the allegation by Channel One is</p> <p>19 that I killed Litvinenko and my wife on behalf</p> <p>20 of the CIA, which puts my alleged murderous act</p> <p>21 in a very different -- on a very different</p> <p>22 ground.</p> <p>23 Q. So standing alone, the accusations of</p> <p>24 being a murderer are so incredible as to be not</p> <p>25 believed by a reasonable party. Is that what</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 degree of credibility, so if you allege</p> <p>3 something, you are perceived as more or less</p> <p>4 credible depending on the context and the</p> <p>5 additional, you know, elements of this</p> <p>6 statement.</p> <p>7 So the defamatory weight, let's put</p> <p>8 it that way, or defamatory power of Channel One</p> <p>9 allegations are very strong because of the</p> <p>10 cumulative effect of the allegation itself and</p> <p>11 the other allegation and the third allegation.</p> <p>12 Like why would somebody kill his wife makes no</p> <p>13 sense, but why would somebody kill his wife</p> <p>14 to -- because she talks too much, it makes more</p> <p>15 sense.</p> <p>16 So what I'm saying is that all this</p> <p>17 taken together creates an enormously defamatory</p> <p>18 meaning.</p> <p>19 Q. Do you watch Fox News at all?</p> <p>20 A. Very rarely, but I do.</p> <p>21 Q. Do you ever watch Tucker Carlson?</p> <p>22 A. I watch Tucker Carlson occasionally,</p> <p>23 but not much. Enough to understand what he's</p> <p>24 all about.</p> <p>25 Q. What is your understanding of what</p>
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<p>1 ALEXANDER GOLDFARB</p> <p>2 you just -- standing alone without the CIA</p> <p>3 aspect of it?</p> <p>4 A. I would say that it was much more --</p> <p>5 much less believable depending on the listener,</p> <p>6 much less believable than when it's reinforced</p> <p>7 by alleging the CIA element.</p> <p>8 Q. And you've worked -- you're not an</p> <p>9 agent of -- debatable whether you're an asset or</p> <p>10 were an asset of, but you had meetings with the</p> <p>11 CIA going back to the '80s when they approached</p> <p>12 you, and you spoke with them while at Columbia</p> <p>13 University. Is that correct?</p> <p>14 A. I think we have covered that. I</p> <p>15 believe that technically I could be called an</p> <p>16 asset, but substantively I'm not.</p> <p>17 Q. And you use the term "incredible"</p> <p>18 meaning -- what do you mean by "incredible"?</p> <p>19 The allegations that you're a murderer, that</p> <p>20 you -- well, it's in the transcript, but you</p> <p>21 tell me.</p> <p>22 You said that it's incredible that</p> <p>23 you just up and decided, absent some other</p> <p>24 motivation, to murder Sacha and your wife.</p> <p>25 A. Well, any statement has a certain</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 he's all about?</p> <p>3 A. I think he's crazy.</p> <p>4 Q. Do you think viewers think he's crazy</p> <p>5 or is that --</p> <p>6 A. Well, some viewers think he's crazy,</p> <p>7 some viewers think he's a very serious source of</p> <p>8 information. The same is true about Putin.</p> <p>9 Q. Part of your claims are that the</p> <p>10 accusation of being a CIA agent have put you in</p> <p>11 reasonable threat of physical harm. Is that</p> <p>12 accurate?</p> <p>13 A. Yes.</p> <p>14 Q. And what's the basis for that</p> <p>15 accusation --</p> <p>16 A. The basis for that accusation is</p> <p>17 that, as we all know, there are many bad actors</p> <p>18 around the world who want to harm Americans in</p> <p>19 general and the American Jews in particular, and</p> <p>20 the American Jews who are CIA agents</p> <p>21 cumulatively much more.</p> <p>22 So by being publicly identified as a</p> <p>23 CIA agent to a multimillion audience by a major</p> <p>24 network puts me in objective danger of becoming</p> <p>25 a target of these kind of bad actors. Not</p>



<p style="text-align: right;">Page 246</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 necessarily some, you know, spy agencies, but</p> <p>3 mostly radical groups or some radicalized</p> <p>4 individuals who think that it's a good thing to</p> <p>5 kill a CIA agent, or kidnap, and particularly</p> <p>6 because there were incidents on the record of</p> <p>7 such things happening.</p> <p>8 Q. Have there been any specific</p> <p>9 incidents that you can relate, specific threats</p> <p>10 rather than generalized --</p> <p>11 A. Well, there was a CIA guy killed -- I</p> <p>12 think kidnapped and killed in Turkey --</p> <p>13 Q. (Indiscernible)?</p> <p>14 A. -- (indiscernible).</p> <p>15 (Reporter clarification.)</p> <p>16 Q. When?</p> <p>17 A. When? I can't tell you right away,</p> <p>18 but I researched the issue. There was a CIA</p> <p>19 operative or agent or asset, as you say,</p> <p>20 kidnapped and killed in Turkey maybe 20 years</p> <p>21 ago.</p> <p>22 Q. My question was, have you</p> <p>23 specifically to your own physical security</p> <p>24 suffered any threats as a result of the</p> <p>25 allegation of being a member of the CIA?</p>	<p style="text-align: right;">Page 248</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. It's the "Legal Chronicle from</p> <p>3 New York, Let's Hit Propaganda With a Lawsuit."</p> <p>4 Q. Let's hit them with a lawsuit or</p> <p>5 let's -- or would that also translate to let's</p> <p>6 sue propaganda?</p> <p>7 A. "Let's Hit Propaganda with a</p> <p>8 Lawsuit."</p> <p>9 Q. And why did you punctuate that with</p> <p>10 an exclamation point?</p> <p>11 A. Well, it's a play on a famous quote</p> <p>12 from Russian literature which everybody knows in</p> <p>13 Russia. It was from the time of</p> <p>14 industrialization, something to the effect that</p> <p>15 "Let's hit the lack of proper roads with our</p> <p>16 automobiles," something like that. It's an</p> <p>17 idiom.</p> <p>18 Q. Does an idiom normally get punctuated</p> <p>19 with the exclamation point?</p> <p>20 A. Yes.</p> <p>21 Q. This first paragraph here after this</p> <p>22 intro, tell me if my translation -- or why don't</p> <p>23 you translate it for me.</p> <p>24 A. First paragraph?</p> <p>25 Q. Yes.</p>
<p style="text-align: right;">Page 247</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. I believe if you can count my</p> <p>3 reluctance to travel, for example, outside of</p> <p>4 the United States, I consider that -- for that</p> <p>5 specific reason, I consider that specific</p> <p>6 perception of threat.</p> <p>7 Nobody threatened, you know,</p> <p>8 Litvinenko, or others were killed without a</p> <p>9 prior threat they specifically articulated.</p> <p>10 Nobody articulated that they're going to kill me</p> <p>11 because they believe I'm the CIA, but enough</p> <p>12 people believe that I'm the CIA, and therefore I</p> <p>13 feel an objective threat.</p> <p>14 MR. WANGSGARD: I'm going to share</p> <p>15 Tab 12 and mark it as J.</p> <p>16 (DEPOSITION EXHIBIT J MARKED</p> <p>17 FOR IDENTIFICATION at 5:10 p.m.)</p> <p>18 MR. WANGSGARD: A two-page document</p> <p>19 written in Russian appearing to be from the</p> <p>20 Echo blog of Dr. Goldfarb dated --</p> <p>21 BY MR. WANGSGARD:</p> <p>22 Q. If you could tell me, confirm that</p> <p>23 this is --</p> <p>24 A. December 2, 2019.</p> <p>25 Q. And the title to the left of your --</p>	<p style="text-align: right;">Page 249</p> <p>1 ALEXANDER GOLDFARB</p> <p>2 A. "This blog post is a reminder to our</p> <p>3 friends and enemies that our lawsuit to</p> <p>4 Russian TV channels that had been filed</p> <p>5 more than a year ago has not died, has not</p> <p>6 deflated, and is slowly muddling through</p> <p>7 the American legal jungle."</p> <p>8 Q. Okay. I'm going to stop you there,</p> <p>9 thank you.</p> <p>10 On the second page, this all caps</p> <p>11 heading, what does that say?</p> <p>12 A. The heading is again an idiom which</p> <p>13 essentially says whether this hide -- "hide" I</p> <p>14 mean the skin -- whether this hide is worth you</p> <p>15 know, the processing, whether it's worth doing</p> <p>16 it.</p> <p>17 Q. And it looks like the next paragraph</p> <p>18 is all one sentence. Can you read that to me?</p> <p>19 A. "This is a civil lawsuit, and if we</p> <p>20 win, the respondents will face</p> <p>21 multimillion punitive damages. We</p> <p>22 naturally do not expect that they will pay</p> <p>23 anything, but in case we win, we have a</p> <p>24 possibility -- we'll get a possibility to</p> <p>25 significantly interfere with the commercial</p>



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<p>1 ALEXANDER GOLDFARB</p> <p>2 activities of Channel One and RT in the</p> <p>3 USA, Europe, and elsewhere where they would</p> <p>4 recognize decisions of American courts."</p> <p>5 Q. So significantly interfere with the</p> <p>6 commercial activities --</p> <p>7 A. Yes.</p> <p>8 Q. -- of the defendants?</p> <p>9 A. Uh-huh.</p> <p>10 Q. Is that the basis or is that the</p> <p>11 reason why you wrote this lawsuit?</p> <p>12 A. No. The reason, as I explained, is</p> <p>13 to get the truth known and set the record</p> <p>14 straight and get some justice.</p> <p>15 But the second reason, as in any</p> <p>16 civil suit, is to get damages. The purpose of</p> <p>17 this paragraph and the meaning of this</p> <p>18 paragraphs reflect to the doubts of many people</p> <p>19 that this case is collectible for reasons I'm</p> <p>20 not going to go into if you don't want me to</p> <p>21 elaborate. So the assumption, which was</p> <p>22 expressed to us by many people, including</p> <p>23 potential donors, is that why bother, it's not</p> <p>24 collectable or it's not likely collectable.</p> <p>25 So this is our response, and it says</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 A. What did I say? Can you say it</p> <p>3 again?</p> <p>4 Q. Sacha had no objective basis for</p> <p>5 naming Putin.</p> <p>6 A. Oh. When Sacha named Putin in his</p> <p>7 deathbed statement as his murderer essentially,</p> <p>8 he didn't have any evidence other than a hunch.</p> <p>9 Q. Ultimately there was -- I guess it</p> <p>10 was both an inquest and became an inquiry in the</p> <p>11 UK --</p> <p>12 A. Yes.</p> <p>13 Q. -- in the complaint?</p> <p>14 Did you provide testimony in that</p> <p>15 proceeding?</p> <p>16 A. Yes, I did.</p> <p>17 Q. Have you reviewed the statements in</p> <p>18 that proceeding that are attributable to you?</p> <p>19 A. I guess I did, at the time, yeah.</p> <p>20 Q. Are any of those incorrect?</p> <p>21 A. I don't think so, no. They correct.</p> <p>22 Q. Did you provide written witness</p> <p>23 statements in that proceeding?</p> <p>24 A. Honestly, I don't remember.</p> <p>25 Q. If you provided written witness</p>
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<p>1 ALEXANDER GOLDFARB</p> <p>2 that maybe it's not collectable, but at least we</p> <p>3 will hurt their -- the guilty party, the</p> <p>4 offenders, by making their life difficult</p> <p>5 through the enforcement of the court decision.</p> <p>6 That's what I refer to.</p> <p>7 Q. Did Alexander Litvinenko know that</p> <p>8 polonium-210 was determined to be the cause of</p> <p>9 his death before he died or did he pass away not</p> <p>10 knowing that?</p> <p>11 A. No, he passed away not knowing that.</p> <p>12 Q. In 2007, when you appeared before the</p> <p>13 Frontline Club, you suggested that it was</p> <p>14 determined about 30 minutes before he passed</p> <p>15 away that polonium-210 had been identified. Do</p> <p>16 you recall that?</p> <p>17 A. About so, that's when we learned</p> <p>18 about it.</p> <p>19 Q. But that information did not make it</p> <p>20 to him?</p> <p>21 A. No. He was in a coma by then.</p> <p>22 Q. In that same appearance, the</p> <p>23 Frontline Club in 2007, you said that, quote,</p> <p>24 Sacha had no objective basis for naming Putin.</p> <p>25 What did you mean by that?</p>	<p>1 ALEXANDER GOLDFARB</p> <p>2 statements in that proceeding, would they have</p> <p>3 been your own words as opposed to having been</p> <p>4 written by anyone else?</p> <p>5 A. No. What I definitely remember that</p> <p>6 I was put on the stand, and whatever I read in</p> <p>7 this transcript later was an accurate</p> <p>8 transcription of what I said on the stand.</p> <p>9 Q. So you testified.</p> <p>10 A. I testified, yes.</p> <p>11 Q. How many times did you testify during</p> <p>12 the UK proceeding?</p> <p>13 A. I think once, but it was a long</p> <p>14 testimony.</p> <p>15 Q. And you were given the opportunity to</p> <p>16 review the transcript or the output of your</p> <p>17 testimony?</p> <p>18 A. No. I just read it in the final --</p> <p>19 the report and whatever they put on the website.</p> <p>20 They didn't give it to me in the course of the</p> <p>21 hearings.</p> <p>22 Q. When you read it on the website, did</p> <p>23 you disagree with any of what was attributed to</p> <p>24 you?</p> <p>25 A. No.</p>



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Q. Have any of the CIA-hating individuals out there that you mentioned earlier specifically threatened you?

A. No.

Q. How many times have you met Walter Litvinenko in person?

A. Several times, many times during the time he was in London when Litvinenko was dying and died and afterwards. I don't remember whether I've met Walter before, if at all he visited London, but I met him at that time and probably a couple of times later when -- at the funeral definitely and so on. So probably I've met him dozen -- more than a dozen of times, mostly at that time.

Q. When's the last time you met him or spoke with him?

A. Probably at the funeral. I'm not hundred percent sure, but I spoke with him on the phone later on in the course of transferring that money that I mentioned before.

Q. The money while he was living in Italy?

A. Yes.

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Q. In the UK inquiry, you stated that you forgive him. Do you forgive Walter?

A. I would say that the UK inquiry was before his participation in the problems we discuss now, so yes, I stand by those forgiveness.

If you ask me whether I forgive him today, I would say, as they used to in Russia or what Sacha said about Putin in his deathbed statement, let the Lord be his judge.

Q. Who's Maria Anna Carter?

A. Maria Anna Carter is the legal name of Marina Litvinenko, which she was -- that she took when they naturalized in the UK.

Q. Why did she change her name to Maria Carter?

A. The usual practice of the British government when they give asylum to people whom they believe are fleeing from real danger, anybody, is to offer them to take a new name. One of the reasons why they do it is that when they believe there is an outstanding arrest warrant from Russia through Interpol so that the people can travel with a different name.

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So this is what was offered to Marina and Sacha at the time they got their residence -- their asylum shortly after they arrived to UK, and they chose these names. He was Redwald Carter and she was Maria Anna Carter.

MR. WANGSGARD: Let's take a five-minute break just to collect our thoughts and then see if we can wrap it up within five to ten minutes thereafter.

(Recess taken at 5:25 p.m.)

(Back on the record at 5:32 p.m.)

MR. WANGSGARD: Let's go back on the record at about 5:32 according to my clock.  
BY MR. WANGSGARD:

Q. Dr. Goldfarb, did you tell the Daily Beast in 2018 that you forgave Walter Litvinenko specifically in September of 2018?

A. I might have.

Q. Have you ever met Lugovoi, Mr. Lugovoi?

A. Yes. In the old days when he was working for Mr. Berezovsky in Moscow, I met him, and then I met him for the second time in France

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shortly after Litvinenko's defection and Berezovsky's emigration at the Berezovsky's house in the south of France.

Q. And what was the purpose of that meeting?

A. The purpose of the second meeting was the -- well, there was a general kind of crowd there in Berezovsky's house. I think he was discussing where it would be better for him to go, to settle in UK or the US, and that was the meeting and Lugovoi was there.

And another aspect of that meeting was that Berezovsky asked me to help Lugovoi get a US visa, though it was not in Lugovoi's presence, and I said -- like inviting him as a personal guest, and I said no.

Q. Have you ever met Mr. Kovtun?

A. No, never.

Q. Do you know why Sacha Alexander Goldfarb was willing to meet them in October and then again in November 2006?

A. You mean Litvinenko?

Q. Yes.

A. Why he --

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Q. Why he would be willing to meet with them at the Millennium Bar and at the sushi bar?

A. Well, if you want my honest answer is this.

Q. I do.

A. I believe, based on the evidence that transpired in the public inquiry, that Mr. Lugovoi was a British, as you say, asset in the sense that they met with him and they tried to engage him in some of their activities and they vetted him. So I believe that Sacha met Lugovoi because he was vetted by his handlers at MI6.

Q. Did you and Maria Carter a/k/a Marina Litvinenko ever create a podcast in approximately 2019 to discuss these events in your book?

A. We were planning this and we were discussing this, but if I remember correctly, it never came to any fruition.

Let me elaborate. Actually we started as some sort of a two-sided podcast on -- I think it was on YouTube or on Facebook, and maybe we produced one or two issues

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essentially dedicated to our book, but then it died out.

MR. WANGSGARD: I'm sharing my screen to introduce Exhibit K, a one-page document bearing Bates stamp G625.

(DEPOSITION EXHIBIT K MARKED FOR IDENTIFICATION at 5:38 p.m.)

BY MR. WANGSGARD:

Q. Do you recognize this document?

A. It looks like an email from me to Marina.

MR. SELLIER: Did you mention the tab of that?

MR. WANGSGARD: Tab 18.

MR. SELLIER: Okay.

BY MR. WANGSGARD:

Q. You know, it's seven words. Can you read the seven words of the content of the email, please?

A. It's just, you know, an empty email with apparently some attachments.

Q. And the subject is "Draft Schedule"?

A. Yeah.

Q. Did you, to your knowledge, produce

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the attachment, this -- it looks to be an .xl -- sx or Excel attachment?

A. Did I produce -- oh, I remember what it was. Yes, I did.

Q. You produced the attachment to this email?

A. Yeah. If you open it, I'll tell you for sure, but I think -- let me see it before I answer.

Q. So I guess the issue is I couldn't find that, so...

A. Oh, you couldn't find that attachment.

Q. Correct.

A. It looks some Excel documents, so then I can't comment because I don't really remember.

Q. Understood, thank you.

Did I hear you correctly that Lugovoi was a British asset, British Intelligence asset?

A. Can you repeat the question?

Q. Was Lugovoi a British Intelligence asset?

A. I think so. There's an inference

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from evidence that was made public during the London inquiry.

Q. If your inference is correct and he was a British Intelligence asset, and in that capacity associated with the British government and he had a role in Sacha's murder, does that mean the British government had a role in Sacha's murder based on the inferences?

A. No, I believe he was a double agent. He was simultaneously a British asset and the FSB Russian asset, and he fooled the Brits and he killed Sacha on behalf of the Russian secret service and Mr. Putin.

Q. Do people who contribute a hundred dollars or more to your GoFundMe page receive a copy of your book?

A. Yes, they do.

MR. WANGSGARD: So just while we're on the record, you know, Randy and I discussed during one of the breaks that there may be some documents that we'll follow up, but we're happy to do that via email, but we've agreed to work together on that. Otherwise, that's everything I have.

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1 ALEXANDER GOLDFARB  
 2 MR. SELLIER: Great. We'll go off  
 3 the record.  
 4 (Off the record.)  
 5 MR. WANGSGARD: Yes, I'd like the  
 6 transcript, please. Regular turnaround and  
 7 then a rough draft.  
 8 (TIME NOTED: 5:50 p.m.)  
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1 \*\*\* ERRATA SHEET \*\*\*  
 2 TRANSPERFECT DEPOSITION SERVICES  
 216 E. 45th Street, Suite #903  
 3 NEW YORK, NEW YORK 10017  
 (212) 400-8845  
 4 CASE: ALEX GOLDFARB vs. CHANNEL ONE RUSSIA  
 DATE: MARCH 4, 2022  
 5 WITNESS: ALEXANDER GOLDFARB REF: 4369  
 6 PAGE LINE FROM TO  
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 16  
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 19  
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 21  
 22 ALEXANDER GOLDFARB  
 23 Subscribed and sworn to before me  
 24 this \_\_\_\_ day of \_\_\_\_\_, 20\_\_.  
 25 \_\_\_\_\_  
 Notary Public

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1 ALEXANDER GOLDFARB  
 2 C E R T I F I C A T E  
 3  
 4  
 5

6 I, PAULA S. RASKIN, Certified  
 7 Shorthand Reporter and Notary Public,  
 8 hereby certify that this deposition was  
 9 taken before me on the date hereinbefore  
 10 set forth; that the foregoing questions and  
 11 answers were recorded by me  
 12 stenographically and reduced to computer  
 13 transcription; that this is a true, full,  
 14 and correct transcript of my stenographic  
 15 notes so taken; and that I am not related,  
 16 nor of counsel, to either party, nor  
 17 interested in the event of this cause.  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

\_\_\_\_\_  
 Paula Raskin, CSR

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